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T901 V.2

**AIR, PESTICIDES, AND TOXICS
6TH FLOOR RECORDS CENTER
INFILING / NEW FILE FORM**

New File ☐

OR

Infiling ☒

Choose from the file types below:

AIR FACILITY:☐ AR - Acid Rain☐ CB - Confidential Business☐ CO - Compliance☐ EN - **Enforcement☐ GE - General☒ PE - Permit☐ RA - Regulatory Applicability☐ Other _____**TSCA:**☐ AH - Asbestos Hazard Emergency
Response Act☐ AS or AW - Asbestos or Asbestos
Worker Protection☐ CB - Confidential☐ FI - Site Specific☐ FO - Non Site Specific☐ IM - **Section 5 & 8☐ LB - **Lead☐ PC - **PCB** Extension of file type (if needed): ☐ ES - Enforcement Sensitive☐ DO - Docket Number**EPCRA/SARA** ☐**FIFRA** ☐*EPA Registry I.D.*Current FRS Number:
(Found in EnviroFacts)110000460901

Facility Name & Physical Address:

Rhodia Inc.
No. 8 Sulfuric Acid Unit8615 Manchester St.Houston, Tx. 77012 2142

Remarks:

Requestor's Name & Phone Number:

Les Kovar X6733

Program Management Files:

A current listing of these file types and their numeric codes are located in a blue binder on the top shelf of the "APT" file cabinet in the 9th Floor Records Center.

AIRS - Aerometric Information Retrieval System

ATO - Air Toxics

EMR - Emergency Response

ENF - Enforcement -

ENF 5-5-1 requires Month and Fiscal Year accompany file code.

ENF 5-6-5 requires Fiscal Year accompany file code.

EXR - External Relations

GEO - Geographical Summary Data

GRA - Grants Administration

The majority of this section requires the Fiscal Year accompany file code.

Project Officer Grants require the Grant number and Fiscal Year accompany file code.

LAB - Laboratory Support

LBP - Lead Based Paint

LBP 12-3 requires the facility name in which document refers to be either highlighted or circled on the top page.

LEL - Legal and Legislative

MON - Monitoring NES - National Emission Standards

NSP - New Source Performance

NSR - New Source Review

OPP - Operating Permits Program

PEA - Permits Administration Program

PES - Pesticides

PLA - Planning

PUA - Public Affairs

RAD - Radiation

RCR - Resource Conservation and Recovery Act - Regulatory Development

RDE - Research and Development

REG - Registration

SIP - State Implementation Plan

SUP - Superfund

TITL - Title III

TSC - Toxic Substance Control

TSC 1-1-4 requires the facility name in which document refers to be either highlighted or circled on the top page.

TSU - Technical Support

VRP - Voluntary Reduction Program



EPA

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 21, 2011

MR FLOYD DICKERSON
ENVIRONMENTAL MANAGER
RHODIA INC
8615 MANCHESTER ST
HOUSTON TX 77012-2142

Re: Permit Amendment Application
Permit Number: 19282
No. 8 Sulfuric Acid Unit
Houston, Harris County
Regulated Entity Number: RN100220581
Customer Reference Number: CN600125330

RECEIVED
11 OCT - 6 PM 3: 56
AIR PERMITS SECTION
6PD-R

Dear Mr. Dickerson:

The executive director has completed the technical review of your application and has prepared a preliminary decision and draft permit.

You are now required to publish notice of your proposed activity. To help you meet the regulatory requirements associated with this notice, we have included the following items:

- Notices for Newspaper Publication (Examples A and B)
- Public Notice Checklist
- Instructions for Public Notice
- Affidavit of Publication for Air Permitting (Form TCEQ-20533) and Alternative Language Affidavit of Publication for Air Permitting (Form TCEQ-20534)
- Notification List
- Draft Permit

Please note that it is **very important** that you follow **all** directions in the enclosed instructions. If you do not, you may be required to republish the notice. A common mistake is the unauthorized changing of notice wording or font. If you have any questions, please contact us before you proceed with publication.

A "Public Notice Checklist" is enclosed which notes the time limitations for each step of the public notice process. This checklist should be used as a tool in conjunction with the enclosed, detailed instructions.

If you do not comply with **all** requirements described in the instructions, further processing of your application may be suspended or the agency may take other actions.

Mr. Floyd Dickerson
Page 2
September 23, 2011

Re: Permit Number 19282

If you have any questions regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300. If you have any other questions, please contact Mr. Stephen Anderson, P.E., at (512) 239-1287.

Sincerely,

Bridget C. Bohac
Bridget C. Bohac
Chief Clerk
Office of the Chief Clerk
Texas Commission on Environmental Quality
BB/SEA

Enclosures

cc: Air Section Manager, Region 12 - Houston
Director, Environmental Public Health Division, Harris County Public Health and
Environmental Services, Pasadena
Bureau Chief Pollution Control & Prevention, Environmental Health Division, Houston
Department of Health and Human Services, Houston
Air Permits Section Chief, New Source Review, Section (6PD-R), U.S. Environmental
Protection Agency, Region 6, Dallas

Project Number: 168535

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



EXAMPLE A

NOTICE OF APPLICATION AND PRELIMINARY DECISION FOR AN AIR QUALITY PERMIT

PERMIT NUMBER: 19282

APPLICATION AND PRELIMINARY DECISION. Rhodia Inc., 8615 Manchester Street, Houston, Texas 77012-2142, has applied to the Texas Commission on Environmental Quality (TCEQ) for an amendment to Air Quality Permit Number 19282, which would authorize modification to the No. 8 Sulfuric Acid Unit at 8615 Manchester Street, Houston, Harris County, Texas 77012. This application was submitted to the TCEQ on August 1, 2011. The existing facility will emit the following contaminants: organic compounds, nitrogen oxides, sulfur dioxide, chlorine, sulfuric acid, lead, carbon monoxide and particulate matter including particulate matter with diameters of 10 microns or less and diameters of 2.5 microns or less.

The executive director has completed the technical review of the application and prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The executive director has made a preliminary decision to issue the permit because it meets all rules and regulations. The permit application, executive director's preliminary decision, and draft permit will be available for viewing and copying at the TCEQ Central Office, the TCEQ Houston Regional Office, and at the Houston Public Library - Melcher Neighborhood Library, 7200 Keller Street, Houston, Harris County, Texas, beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review at the TCEQ Houston Regional Office, 5425 Polk Street, Suite H, Houston, Texas.

PUBLIC COMMENT/PUBLIC MEETING. You may submit public comments or request a public meeting about this application. The purpose of a public meeting is to provide the opportunity to submit comment or to ask questions about the application. The TCEQ will hold a public meeting if the executive director determines that there is a significant degree of public interest in the application or if requested by a local legislator. A public meeting is not a contested case hearing. **You may submit additional written public comments within 30 days of the date of newspaper publication of this notice in the manner set forth in the AGENCY CONTACTS AND INFORMATION paragraph below.**

RESPONSE TO COMMENTS AND EXECUTIVE DIRECTOR ACTION. After the deadline for public comments, the executive director will consider the comments and prepare a response to all relevant and material or significant public comments. Because no timely hearing requests have been received, after preparing the response to comments, the executive director may then issue final approval of the application. **The response to comments, along with the executive director's decision on the application will be mailed to everyone who submitted public comments or is on a mailing list for this application, and will be posted electronically to the Commissioners' Integrated Database (CID).**

INFORMATION AVAILABLE ONLINE. When they become available, the executive director's response to comments and the final decision on this application will be accessible through the Commission's Web site at www.tceq.texas.gov/goto/cid. Once you have access to the CID using the above link, enter the permit number for this application which is provided at the top of this notice. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. http://prs.tceq.texas.gov/crintprt/index.cfm?fuseaction=detail.addnIdDetail&addn_id=573791102002159&getall=no#.

MAILING LIST. You may ask to be placed on a mailing list to obtain additional information on this application by sending a request to the Office of the Chief Clerk at the address below.

AGENCY CONTACTS AND INFORMATION. Public comments and requests must be submitted either electronically at www.tceq.texas.gov/about/comments.html, or in writing to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. If you communicate with the TCEQ electronically, please be aware that your email address, like your physical mailing address, will become part of the agency's public record. For more information about this permit application or the permitting process, please call the Public Participation and Education Program toll free at 1-800-687-4040. Si desea información en Español, puede llamar al 1-800-687-4040.

Further information may also be obtained from Rhodia Inc at the address stated above or by calling Mr. Floyd Dickerson, Environmental Manager, at (713) 924-1408.

Notice Issuance Date: September 23, 2011

Example B

Publication Elsewhere in the Newspaper:

TO ALL INTERESTED PERSONS AND PARTIES:

Rhodia Inc. has applied to the Texas Commission on Environmental Quality (TCEQ) for an amendment to Air Quality Permit Number 19282, which would authorize modification to the No. 8 Sulfuric Acid Unit at 8615 Manchester St, Houston, Harris County, Texas 77012. Additional information concerning this application is contained in the public notice section of this newspaper.

3"
minimum

← Minimum 2 column widths or 4 inches →



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Public Notice Checklist
Notice of Application and Preliminary Decision for an Air Quality Permit
(2nd Notice)

The following tasks must be completed for public notice. If publication in an alternative language is required, please complete the tasks for both the English and alternative language publications. Detailed instructions are included in the "Instructions for Public Notice" section of this package.

Within 33 calendar days after date of this letter

Publish *Notice of Application and Preliminary Decision for an Air Quality Permit* in the same newspaper(s) in which you published *Notice of Receipt of Intent to Obtain Permit* for this application.

- Example A must be published in "public notice" section of newspaper. Review for accuracy prior to publishing.
- Example B (if applicable) must be published in prominent location (other than "public notice") in same issue of newspaper

Provide copy of the complete application (including any subsequent revisions) and the executive director's preliminary decision (including the draft permit) at a public place for review and copying. Keep them there for duration of the designated comment period.

First day of newspaper publication

Review published newspaper notice for accuracy. If errors, contact Air Permits Division.

Ensure copy of the complete application (including any subsequent revisions) and the executive director's preliminary decision (including the draft permit) are at the public place.

Within 10 business days after date of publication

Mail original newspaper clippings showing publication date and newspaper name to:

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Mail photocopies of newspaper clippings showing publication date and newspaper name to persons listed on *Notification List*.

Within 30 calendar days after date of publication

Mail original affidavit of publication for air permitting and alternative language affidavit of publication for air permitting (if applicable) to:

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Mail photocopies of affidavits to persons listed on *Notification List*.

Within 10 business days after end of the designated comment period

Mail Public Notice Verification Form to:

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Mail photocopies of Public Notice Verification Form to persons listed on *Notification List*.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



Instructions for Public Notice For New Source Review Air Permit

Notice of Application and Preliminary Decision

We have completed the technical review of your application and issued a preliminary decision. You must comply with the following instructions:

Review Notice

Included in the notice is all of the information which the commission believes is necessary to effectuate compliance with applicable public notice requirements. Please read it carefully and notify the Texas Commission on Environmental Quality (TCEQ) immediately if it contains any errors or omissions. You are responsible for ensuring the accuracy of all information published. You may not change the text of the notice without prior approval from the TCEQ.

Newspaper Notice

- You must publish the enclosed *Notice of Application and Preliminary Decision for an Air Quality Permit* within **33 calendar days** after the date this information was mailed to you (see date of letter).
- You must publish the enclosed *Notice of Application and Preliminary Decision for an Air Quality Permit* at your expense, in the same newspaper(s) in which you published the *Notice of Receipt and Intent to Obtain Permit* for this application. The newspaper must be a newspaper that is of general circulation in the municipality where the facility is or will be located. If the facility is not located within a municipality, the newspaper must be of general circulation in the municipality nearest the location.
- You must publish this notice in one issue of any applicable newspaper.
- You will find two example notices enclosed in this package. *Example A* must be published in the "public notice" section of the newspaper. The phrase "Example A" is not required to be published. *Example B* must be published in the **same issue** of the newspaper as *Example A*; however, it must be published in a prominent location (other than the public notice section). *Example B* refers the public to the "public notice" section of the newspaper where *Example A* provides more information regarding the permit application.

- *Example B* must be a total of at least **6 column inches (standard advertising units)** with a height of at least **3 inches** and a horizontal dimension of **2 column widths**. If the newspaper chosen does not use standard advertising units for measurement, the notice must be at least **12 square inches** with the shortest side of at least **3 inches**.
- The bold text of the enclosed notice **must** be printed in the newspaper in a font style or size that distinguishes it from the rest of the notice (i.e., **bold**, *italics*). **Failure to do so may require re-notice.**

Alternative Language Notice

In certain circumstances, applicants for air permits must complete notice in alternative languages.

- Public notice rules require the applicant to determine whether a bilingual program is required at either the elementary or middle school nearest to the facility or proposed facility location. Bilingual education programs are determined on a district-wide basis. When students who are required to attend either school are eligible to be enrolled in a bilingual education program, some alternative language notice is required (newspaper notice).
- Since the school district, and not the schools, must provide the bilingual education program, these programs do not have to be located at the elementary or middle school nearest to the facility or proposed facility to trigger the alternative language notice requirement. If there are students who would normally attend the nearest schools eligible to be taught in a bilingual education program at a different location, alternative language notice is required.
- If triggered, publications of alternative language notices must be made in a newspaper or publication printed primarily in each language taught in the bilingual education program. The same newspaper(s) used for *Notice of Receipt and Intent to Obtain Permit* must be used for publication of the *Notice of Application and Preliminary Decision for an Air Quality Permit*. This notice is required if such a newspaper or publication exists in the municipality or the county where the facility is or will be located.
- The applicant must demonstrate a good faith effort to identify a newspaper or publication in the required language. If a newspaper or publication of general circulation published at least once a month in such language cannot be found, publishing in that language is not required, but signs must still be posted adjacent to each English language sign.
- Publication in an alternative language section or insertion within an English language newspaper does not satisfy these requirements.
- The applicant has the burden to demonstrate compliance with these requirements. You must fill out the *Public Notice Verification Form (Form TCEQ-20244)* indicating

your compliance with the requirements regarding publication in an alternative language. This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.

- It is suggested the applicant work with the local school district to do the following:
 - (a) determine if a bilingual program is required in the district;
 - (b) determine which language is required by the bilingual program;
 - (c) locate the nearest elementary and middle schools; and
 - (d) determine if any students attending either school are entitled to be enrolled in a bilingual educational program.
- If you determine that you must meet the alternative language notice requirements, you are responsible for ensuring that the publication in the alternative language is complete and accurate in that language. Since the most common bilingual programs are in Spanish, the TCEQ has provided example Spanish notice templates for your use. All italic notes should be replaced with the corresponding Spanish translations for the specific application and published in the alternative language publication. Electronic versions of the Spanish templates are available through the Air Permits Division Web site at www.tceq.texas.gov/goto/air/publicnotice.

- If you are required to publish notice in a language other than Spanish, you must translate the entire public notice at your own expense.

Public Comment Period

- The public comment period will last at least **30 calendar days after publication of the last notice**.
- The comment period will be longer if the last day of the public comment period ends on a weekend or a holiday. In this case, the comment period will end on the next business day.
- The comment period for the permit may lengthen depending on whether a public meeting is held. If a public meeting is held, the comment period will be extended to the later of either the date of the public meeting or the end of the second notice period.

Proof of Publication

- Check each publication to ensure that the articles were accurately published. If a notice was not published correctly you may be required to republish.
- For each newspaper in which you published, you must submit **original newspaper clippings or tear sheets** of each published notice which shows the complete notice that was published, the date of publication, and the name of the newspaper to the TCEQ Office of the Chief Clerk within **10 business days** after the date of publication.

- You must submit an **original affidavit of publication for air permitting and alternate language affidavit of publication for air permitting (if applicable)** to the Office of the Chief Clerk within **30 calendar days** after the date of publication. **You must use the enclosed affidavit forms.** The affidavits must clearly identify the applicant's name and permit number. You are encouraged to submit the affidavit with the original newspaper clippings described above.
- You must submit the ***Public Notice Verification Form (Form TCEQ-20244)*** to the Office of the Chief Clerk within **10 business days** of the end of this public comment period. You must use this form to certify that you have met bilingual notice requirements. **This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**
- The **original affidavits of publication, *Public Notice Verification Form*, and original newspaper clippings of the published notices** must be mailed to:

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

- Please ensure that the affidavit and newspaper clippings you send to the Chief Clerk are originals and that all blanks on the affidavit are filled in correctly. Photocopies of newspaper clippings and affidavits will not be accepted.
- Photocopies of newspaper clippings, affidavits, and verifications must also be sent to those listed on the enclosed *Notification List* within the deadlines specified above.

Failure to Publish and Submit Proof of Publication

You must meet all publication requirements. **If you fail to publish the notice or submit proof of publication on time**, the TCEQ may suspend further processing on your application or take other actions.

Sign Posting

Signs must remain in place and be legible and be visible from the street for the entire duration of the comment period, from the beginning of the *Notice of Receipt and Intent* until the close of the comment period after publication of the *Notice of Application and Preliminary Decision*.

Application in a Public Place

- You must provide a copy of the complete application (including any subsequent revisions) and the executive director's preliminary decision (including the draft permit), at a public place for review and copying by the public. This place must be in the county in which the facility is located or proposed to be located.

- A public place is one that is publicly owned or operated (ex: libraries, county courthouses, or city halls.)
- This copy must be accessible to the public for review and copying. The copy must be available beginning on the first day of newspaper publication and remain in place until the commission has taken action on the application or the commission refers issues to the State Office of Administrative Hearings.
- If the application is submitted to the TCEQ with information marked as "CONFIDENTIAL," you are required to indicate which specific portions of the application are not being made available to the public. These portions of the application must be accompanied with the following statement: "Any request for portions of this application that are marked as confidential must be submitted in writing, pursuant to the Public Information Act, to the Texas Commission on Environmental Quality, Public Information Coordinator, MC-197, P.O. Box 13087, Austin, Texas 78711-3087."
- You must submit verification of file availability using the *Public Notice Verification Form (Form TCEQ-20244)* within **10 business days** after end of the publications' designated comment period. Do not submit the form verifying that the application was in a public place until after the comment period is complete. If a public meeting is held or second notice is required causing the public comment period to be extended, at a later date you will be required to verify that the application was in a public place during the entire public comment period. **This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**

General Information

When contacting the Commission regarding this application, please refer to the permit number at the top of the *Notice of Application and Preliminary Decision*.

If you have questions or need assistance regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300 or the project reviewer listed in the cover letter.

AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §

COUNTY OF _____ §

Before me, the undersigned authority, on this day personally appeared

_____, who being by me duly sworn,
(name of newspaper representative)

deposes and says that (s)he is the _____
(title of newspaper representative)

of the _____; that said newspaper is generally circulated
(name of newspaper)

in _____, Texas;
(in the municipality or nearest municipality to the location of the facility or the proposed facility)

that the attached notice was published in said newspaper on the following date(s):

(newspaper representative's signature)

Subscribed and sworn to before me this the _____ day of _____, 20____,
to certify which witness my hand and seal of office.

(Seal)

Notary Public in and for the State of Texas

Print or Type Name of Notary Public

My Commission Expires

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Rhodia Inc.

Permit No.: 19282

ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS

§

COUNTY OF _____ §

Before me, the undersigned authority, on this day personally appeared

_____, who being by me duly sworn, deposes
(name of newspaper or publication representative)

and says that (s)he is the _____
(title of newspaper or publication representative)

of the _____; that said newspaper or publication is generally circulated
(name of newspaper or publication)

in _____, Texas;
(in the municipality or the same county as the location of the facility or the proposed facility)

that the attached notice was published in said newspaper or publication on the following date(s):

(newspaper or publication representative's signature)

Subscribed and sworn to before me this the _____ day of _____, 20____.

to certify which witness my hand and seal of office.

Notary Public in and for the State of Texas

(Seal)

Print or Type Name of Notary Public

My Commission Expires

NOTIFICATION LIST

It is the responsibility of the applicant to furnish the following offices with copies of the notices published, the *Affidavit of Publication for Air Permitting*, the *Alternative Language Affidavit of Publication for Air Permitting (if applicable)*, and a completed copy of the *Public Notice Verification Form (Form TCEQ-20244)*. Originals should be sent to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. **Copies** should be sent to the following:

U.S. Environmental Protection Agency
Region 6
Attn: Air Permits Section (6PD-R)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Texas Commission on Environmental Quality
Office of Air
Air Permits Division, MC-163
Mr. Stephen Anderson, P.E.
P.O. Box 13087
Austin, Texas 78711-3087

Texas Commission on Environmental Quality
Houston Regional Office
5425 Polk Street, Suite H
Houston, Texas 77023-1452

Bureau Chief Pollution Control & Prevention
Environmental Health Division
Houston Department of Health and Human
Services
7411 Park Place Blvd
Houston, Texas 77087-4441

Director
Environmental Public Health Division
Harris County Public Health and
Environmental Services
101 South Richey Street, Suite G
Pasadena, Texas 77506-



10/10/1918

Received of the Hon. Secy. of the Navy
the sum of \$100.00 for the purpose of
the purchase of the following articles
to wit: 100 lbs. of flour, 100 lbs. of
rice, 100 lbs. of sugar, 100 lbs. of
coffee, 100 lbs. of tea, 100 lbs. of
cocoa, 100 lbs. of butter, 100 lbs. of
lard, 100 lbs. of oil, 100 lbs. of
salt, 100 lbs. of soap, 100 lbs. of
candles, 100 lbs. of matches, 100 lbs. of
paper, 100 lbs. of ink, 100 lbs. of
brushes, 100 lbs. of pens, 100 lbs. of
books, 100 lbs. of stationery, 100 lbs. of
furniture, 100 lbs. of clothing, 100 lbs. of
food, 100 lbs. of medicine, 100 lbs. of
tools, 100 lbs. of hardware, 100 lbs. of
miscellaneous goods.

For the purpose of the purchase of the
above articles, the sum of \$100.00 is
hereby authorized to be paid to the
Hon. Secy. of the Navy, who is
authorized to make such purchase as he
may deem proper, and to report the
results thereof to the Hon. Secy. of the
Treasury.

Witness my hand and the seal of the
Department of the Navy, at Washington,
this 10th day of October, 1918.
J. D. LONG
Secretary of the Navy

For the purpose of the purchase of the
above articles, the sum of \$100.00 is
hereby authorized to be paid to the
Hon. Secy. of the Navy, who is
authorized to make such purchase as he
may deem proper, and to report the
results thereof to the Hon. Secy. of the
Treasury.

SPECIAL CONDITIONS

Permit Number 19282 and PSDTX1081

EMISSION STANDARDS

1. This permit authorizes emissions only from those points listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating conditions specified in this permit.
2. Sulfur dioxide (SO₂) emissions limits will be limited to the following emission rates:
Short term - 3.0 pounds of SO₂ per ton of one hundred percent acid produced.
Long term - 1.7 pounds of SO₂ per ton of one hundred percent acid produced.

These values correlate to hourly and yearly SO₂ emission rates found in the maximum allowable emissions rates table (MAERT) from Emission Point Number (EPN) 101. (PSD)

(01/08)

These facilities shall comply with all applicable requirements shall comply with all applicable requirements of EPA regulations on Standards of Performance for New Stationary Sources promulgated for the following: (x/11)

- A. Emission Guidelines and Compliance Times for Sulfuric Acid Production Units in 40 CFR 60, Subparts A and Cd, and
- B. Sulfuric Acid Plants in 40 CFR 60, Subparts A and H.

The sulfur acid mist (H₂SO₄) mist limits are limited to 0.15 pound per ton of H₂SO₄ EPN 101. SO₂ and H₂SO₄ mist emission limits effective on and after July 1, 2009 shall never be relaxed. (PSD) (12/07)

Natural gas use for furnace heat ups are limited to 150 hours per rolling 12 months at a maximum hourly fired duty of 50 MMBtu and shall be emitted through EPNs 103, 105 and 106. Records shall be kept at the plant site and updated once every six months to demonstrate compliance with this representation. Records shall be made readily available to Texas Commission on Environmental Quality (TCEQ) personnel upon request, the U.S. Environmental Protection Agency (EPA) personnel or any applicable local program with jurisdiction. (x/11)

3. H₂SO₄ production is limited to 2,600 tons per day. The holder of this permit shall keep records of the daily production of H₂SO₄. Records shall be made readily available to TCEQ personnel upon request, EPA personnel or any applicable local program with jurisdiction and may be used to determine compliance with the SO₂ emissions limitations specified in the MAERT. (PSD) (04/10)

SPECIAL CONDITIONS

Permit Number 19282 and PSDTX1081

Page 2

4. Piping, Valves, Flanges, Connectors, Pumps and Compressors in Gaseous and Liquid Sulfur Dioxide (SO₂) Service (12/07)

A. Audio, olfactory and visual checks for gas and liquid SO₂ leaks within the operating area shall be made once every shift. This special condition will apply upon start-up of the represented increase in H₂SO₄ production from the October 2006 amendment submittal.

B. Process gas leaks shall be addressed upon detection of a gaseous SO₂ leak by plant personnel who shall take the following actions:

- (1) Locate and determine the extent of the process gas leak.
- (2) Commence to make repairs to the gas leak.
- (3) Use a leak collection/containment system to prevent the leak until repair or replacement can be made if immediate repair is not possible.

C. Liquid leaks found in damaged or leaking valves, connectors and pump seals in the SO₂ scrubber authorized in the October 2006 amendment submittal found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Every reasonable effort shall be made to repair or replace a leaking component as specified in this paragraph within 15 days after the leak is found. If the repair of a component would require a unit shutdown, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot be repaired until a scheduled shutdown shall be identified for such repair by tagging. At the discretion of the TCEQ Executive Director or designated representative, early unit shutdown or other appropriate action may be required based on the number and severity of tagged leaks awaiting shutdown.

D. Date and time of each inspection shall be noted in the operator's log or equivalent. Records shall be maintained at the plant site of all repairs and replacements made due to leaks. These records shall be made readily available to representatives of the TCEQ or any local program with jurisdiction upon request.

INITIAL DETERMINATION OF COMPLIANCE

5. The holder of this permit shall perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the Unit No. 8 Stack designated as EPN 101. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. (PSD) (07/07)

SPECIAL CONDITIONS

Permit Number 19282 and PSDTX1081

Page 3

- A. Sampling shall be conducted in accordance with Title 40 Code of Federal Regulations (40 CFR) Part 60, Appendix A, Method 7, "Determination of Nitrogen Oxide (NO_x) Emissions from Stationary Sources" and Method 8, "Determination of SO₂ and H₂SO₄ Emissions from Stationary Sources" and Method 10, "Determination of Carbon Monoxide (CO) Emissions from Stationary Sources" and other applicable testing methods.
- B. The appropriate TCEQ Regional Office in the region where the source is located and applicable local air program(s) shall be contacted as soon as testing is scheduled, but not less than 45 days prior to sampling to schedule a pretest meeting.

The notice shall include:

- (1) Date for pretest meeting.
- (2) Date sampling will occur.
- (3) Name of firm conducting sampling.
- (4) Type of sampling equipment to be used.
- (5) Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

A written proposed description of any deviation from sampling procedures specified in permit provision or the TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Director shall approve or disapprove of any deviation from specified sampling procedures.

Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Air, Air Permits Division. Test waivers and alternate/equivalent procedure proposals for New Source Performance Standard testing which must have EPA approval shall be submitted to the TCEQ Field Operations Division in Austin.

SPECIAL CONDITIONS

Permit Number 19282 and PSDTX1081

Page 4

C. Air contaminants emitted from the Unit No. 8 Stack to be tested for include chlorine, SO_2 , H_2SO_4 mist, CO, NO_x , antimony, arsenic, barium, beryllium, cadmium, chromium, lead, mercury, nickel, selenium, silver and thallium. These stack testing results shall be used to demonstrate compliance with Special Condition Nos. 1 and 2.

D. Sampling shall occur at such other times as may be required by the Executive Director of the TCEQ. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office. Additional time to comply with the applicable requirements of 40 CFR Part 60 and 40 CFR Part 61 requires prior approval and requests shall be submitted to the TCEQ Field Operations Division in Austin.

E. The sulfuric acid plant shall be sampled while operating at the maximum possible safe production rate (as determined by the permittee) for the H_2SO_4 unit at the time of testing. The H_2SO_4 production rate shall be monitored and recorded during the stack test. If the normal production rate of H_2SO_4 from this facility exceeds by more than 10 percent the tons per day maintained during sampling, the company must notify, in writing, the appropriate TCEQ Regional Office, and the source may be subject to additional sampling to demonstrate continued compliance.

F. One copy of the final sampling report shall be forwarded to the TCEQ within 60 days after sampling is completed. Sampling reports shall comply with the attached conditions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

One copy to the TCEQ Houston Regional Office.

One copy to each appropriate local air pollution control program.

One copy to the EPA Region 6 New Source Review Section in Dallas.

CONTINUOUS DETERMINATION OF COMPLIANCE

6. The holder of this permit shall install, calibrate, maintain and operate a continuous emission monitoring system (CEMS) to measure and record the in-stack concentration of SO_2 and the total gas flow rate from the Unit No. 8 Stack (EPN 101).

SPECIAL CONDITIONS

Permit Number 19282 and PSDTX1081

Page 5

- A. The CEMS calibration shall be checked daily and the CEMS shall be zeroed and spanned using cylinder gas at least once a week and corrective action taken when the results differ by greater than ± 5 percent from the tagged cylinder gas value.
- B. The monitoring data shall be reduced to one-hour average concentrations at least once every month using a minimum of four equally-spaced data points from each one-hour period. The individual average concentrations shall be reduced to units of the permit allowable emissions rates in pounds of SO_2 per hour at least once every month.
- C. All monitoring data and quality-assurance data shall be maintained by the source for a period of two years and shall be made readily available to TCEQ personnel, EPA personnel or any local program with jurisdiction upon request. The data from the CEMS may, at the discretion of the TCEQ, EPA personnel or any local program with jurisdiction, be used to determine compliance with the SO_2 emission limits specified in MAERT.
- D. The CEMS must operate at all times when sulfur bearing compounds (except natural gas) are being fed to the furnace, but need not operate during CEMS breakdown, repairs for calibration checks and zero span adjustments. (12/07)
- E. CEMS shall be used to demonstrate compliance with the SO_2 emission limits as found in Special Condition No. 2. The permit holder must meet the quality assurance procedures required by 40 CFR Part 60 Appendix F or any alternate procedures specified in the Alternate Monitoring Plan (AMP) (Attachment A). (12/07)
- (1) The SO_2 CEMS shall monitor and record the three hour arithmetic average (not weighted by production volume) SO_2 emission rate in units of pounds per ton of one hundred percent acid produced.
 - (2) The SO_2 CEMS shall monitor and record the SO_2 emission rate averaged (arithmetic average, not weighted by production) over all operation hours in each 365 day period in units of pounds per ton of one hundred percent acid produced.
 - (3) Implementation of the monitoring requirements has been defined in the AMP for the SO_2 CEMS system.
 - (4) The AMP supersedes the corresponding SO_2 monitoring requirements of NSPS Subpart H.

SPECIAL CONDITIONS

Permit Number 19282 and PSDTX1081

Page 6

- (5) All steps necessary to avoid CEMS breakdowns and minimize CEMS down time must be taken. This shall include, but is not limited to, operating and maintaining the CEMS in accordance with best practices and maintaining an on-site inventory of spare parts or other supplies necessary to make rapid repairs of the equipment.
- (6) In the event of a CEMS downtime lasting longer than twenty-four hours, the permittee shall demonstrate compliance with the emission limits established in Special Condition No. 2 according to the procedures specified in the AMP.

7. The minimum liquid flow to the second stage of the absorber shall be 600 gallons per minute (gpm). The circulation rate shall be monitored and recorded at least once a day.

(x/11)

The liquid flow rate shall be recorded at least once an hour.

The flow monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least annually, whichever is more frequent, and shall be accurate to within 2 percent of span or 5 percent of the design value.

The minimum pH of the scrubbing solution downstream of the Brinks mist filter is 5.0. This pH shall be analyzed and recorded at least once a day.

Each monitoring device shall be cleaned with an automatic cleaning system, or cleaned weekly using hydraulic, chemical or mechanical cleaning. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least weekly, whichever is more frequent, and shall be accurate to within 0.5 pH unit.

Quality-assured (or valid) data must be generated when the facility generating emissions are operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in hours) that the facility generating emissions operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgement and the methods used recorded.

8. The following requirements apply to capture systems for EPN 101. (07/07)

SPECIAL CONDITIONS

Permit Number 19282 and PSDTX1081

Page 7

- A. The permit holder shall conduct a once a month visual, audible, and/or olfactory inspection of the capture system to verify there are no leaking components in the capture system;
- B. The control device shall not have a bypass.
- C. If any of the above inspections are not satisfactory, the permit holder shall promptly take necessary corrective action.

PLANNED MAINTENANCE, STARTUP AND SHUTDOWN

9. Catalyst converter planned MSS activity is limited to 512 hours per rolling twelve months from EPN CATSCNU8. Planned MSS generated particulate emissions shall be directed to a bag filter. Outlet bag filter grain loading shall be limited to a maximum of 0.01 grains per dry standard cubic foot. (x/11)

Only these planned MSS activities described in this condition are authorized by this permit. These emissions are subject to the maximum allowable emission rates indicated on the maintenance, start-up, and shutdown (MAERT). The performance of each planned maintenance activity and emissions associated with it shall be recorded and the rolling 12-month emissions shall be updated on a monthly basis. These records shall include at least the following information: (x/11)

- (1) The physical location at which emissions from the planned MSS activity occurred, including the emission point number, common name, and any other identifier for the point at which the emissions were released into the atmosphere;
- (2) The type of planned MSS activity and the reason for the planned activity;
- (3) The common name and the facility identification number of the facilities at which the planned MSS activity and emissions occurred;
- (4) The date and time of the planned MSS activity and its duration;
- (5) The estimated quantity of each air contaminant, or mixture of air contaminants, emitted with the data and methods used to determine it. The emissions shall be estimated using the methods identified in the amendment application, PI-1 dated July 28, 2011, consistent with good engineering practice.

Dated month day, 2011

Attachment A
Alternative Monitoring Plan for SO₂ Emissions
Rhodia Inc. Houston, TX Unit 8
Single Absorption Sulfuric Acid Plant with Scrubber

Justification for Using an Alternative Monitoring Plan (AMP) for SO₂ emissions

Sulfur dioxide emissions from the Houston 8 sulfuric acid unit will be monitored in accordance with the requirements of the existing NSPS for sulfuric acid plants except as noted in this AMP. The CEMS will demonstrate compliance on a real-time basis with the SO₂ emissions standard (as lbs of SO₂ per ton of 100% sulfuric acid produced) using stack SO₂ and O₂ analyzers. The purpose of this AMP is to document the calculation methods that will be utilized to demonstrate compliance with regulations as modified by the Consent Decree.

Definitions

"CEMS" or "Continuous Emission Monitoring System" shall mean equipment that continuously measures and records the concentration and/or emission rate of a pollutant, in the units specified by the emission limit concerned.

"Long-Term Limit" shall mean a sulfur dioxide (SO₂) emission limit for a sulfuric acid plant expressed as pounds per ton of 100% sulfuric acid produced ("lbs/ton"), averaged over all Operating Hours in a rolling 365-day period.

"Malfunction" shall mean, consistent with 40 C.F.R. § 60.2, any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner, but shall not include failures that are caused in part by poor maintenance or careless operation.

"Operating Hours" shall mean periods during which sulfur or sulfur-bearing compounds, excluding conventional fossil fuels such as natural gas or fuel oil, are being fed to the furnace.

"Short-Term Limit" shall mean the SO₂ emission limit for each sulfuric acid plant expressed as pounds per ton of 100% sulfuric acid produced ("lbs/ton"), averaged over each rolling 3-hour period. Except for periods of Startup, Shutdown and Malfunction, the Short-Term Limits established under this Consent Decree shall apply at all times.

"Shutdown" shall mean the cessation of operation of a sulfuric acid plant for any reason. Shutdown begins at the time sulfur or sulfur-bearing feeds, excluding conventional fossil fuels such as natural gas or fuel oil, to the furnace ceases.

"Startup" shall mean the 24-hour period at any sulfuric acid plant beginning when the feed of sulfur or sulfur-bearing materials, excluding conventional fossil fuels such as natural gas or fuel oil, to the furnace commences after a main gas blower shutdown.

Part 60.84 Emissions Monitoring.

Compliance with the Long-Term Limit and Short-Term Limit defined by the Consent Decree will be demonstrated using SO₂ and O₂ analyzers at the exit stack using the following equation. Refer to additional discussion below the equation for specific details related to data input and calculation.

Equation 1

$$Xe = (0.209 - MO_2 - MSO_2) / (0.209 - MO_2 + 0.186 \times MSO_2)$$

$$E = (K / Xe) - K$$

Where:

Xe = fractional conversion efficiency

MO₂ = fractional concentration of O₂ at the stack, dry basis

MSO₂ = fractional concentration of SO₂ at the stack, dry basis

E = SO₂ emission rate in lb / ton of 100% acid produced

K = 1306 = (2000 lb / ton) x (64 lb / lbmol SO₂) / (98 lb / lbmol H₂SO₄)

Short-Term Limit

The following procedure and calculation will be performed once every five minutes during all Operating Hours, except periods of Startup, Shutdown or Malfunction, to demonstrate compliance with the Short-Term Limit for SO₂.

- At any given time the system will maintain an array consisting of the 36 most recent samples of the O₂ and SO₂ concentrations at the exit stack.
- Once every five minutes, the system will sample the latest O₂ and SO₂ concentrations, add the recent readings to the array and delete the oldest readings. If the unit is not operating then the array of data will not change.
- MO₂_{3hravg} will then be calculated as the arithmetic average of the 36 most recent data samples for the fractional concentration of O₂ at the stack (MO₂_{3hravg}).

- $MSO2_{3hravg}$ will then be calculated as the arithmetic average of the 36 most recent data samples for the fractional concentration of SO_2 at the stack ($MSO2_{3hravg}$).
- The rolling 3 hour average SO_2 emissions (E_{3hravg}) will then be calculated per Equation 2.

Equation 2 (rolling 3 hour average SO_2 emissions)

$$Xe_{3hravg} = (0.209 - MO2_{3hravg} - MSO2_{3hravg}) / (0.209 - MO2_{3hravg} + 0.186 \times MSO2_{3hravg})$$

$$E_{3hravg} = (K / Xe_{3hravg}) - K$$

- The production unit will be deemed to be operating in compliance with the Short Term Limit if $E_{3hr-avg}$ does not exceed 3.0 lb of SO_2 per ton of 100% sulfuric acid produced during all Operating Hours except periods of Startup, Shutdown or Malfunction.

During routine calibration checks and adjustments of the O_2 or SO_2 monitors, the O_2 or SO_2 measurement will be "frozen" at its pre-calibration level. Refer to System Maintenance and Malfunction for guidance during CEMS malfunctions, breakdowns, and repairs.

Long-Term Limit

The following method will be used to calculate the daily average lb of SO_2 per ton of 100% sulfuric acid, and the number of Operating Hours for the calendar day.

- Once every five minutes during all Operating Hours, the O_2 and SO_2 concentrations at the exit stack will be sampled and this time will be counted as five operating minutes. If the unit is not operating, then the O_2 and SO_2 concentrations will not be sampled.
- The daily average will be calculated as follows for each calendar day:
 - o $MO2_{daily avg}$ will be calculated as the arithmetic average of the sample population for the fractional concentration of O_2 at the stack.
 - o $MSO2_{daily avg}$ will be calculated as the arithmetic average of the sample population for the fractional concentration of SO_2 at the stack
 - o $E_{(daily avg)}$ will then be calculated using Equation 3.

Equation 3 (daily average SO_2 emissions)

$$Xe_{daily avg} = (0.209 - MO2_{daily avg} - MSO2_{daily avg}) / (0.209 - MO2_{daily avg} + 0.186 \times MSO2_{daily avg})$$

$$E_{\text{daily avg}} = (K / X_{e_{\text{daily avg}}}) - K$$

- The number of operating minutes for the day will be summed (T_{day})
- E_{dayavg} and T_{day} will be used to calculate a 365-day rolling average of lb/ton. The daily averages will be weighted by the number of operating minutes per day, as per Equation 4.

Once the system has been in operation for 365 days, compliance with the Long Term Limit (365-day rolling average) SO_2 emission rate will be calculated using Equation 4.

Equation 4

$$E_{365\text{avg}} = \frac{\sum [E_{\text{dayavg}} * T_{\text{day}}]}{\sum T_{\text{day}}}$$

The production unit will be deemed to be operating in compliance with the Long-Term Limit if $E_{365\text{avg}}$ does not exceed 1.7 lb of SO_2 per ton of 100% sulfuric acid produced during all Operating Hours

During routine calibration checks and adjustments of the O_2 or SO_2 monitors, the O_2 or SO_2 measurement will be "frozen" at its pre-calibration level. Refer to System Maintenance and Malfunction for guidance during CEMS malfunction, breakdowns, and repairs:

Pt. 60.84 Emissions Monitoring Pt. 60, App. B, Spec. 2, Section 6.0 (Stack Analyzers)

Rhodia proposes to use the following stack analyzer specifications to satisfy the requirements of Pt. 60.84 and Pt. 60, App. B, Spec. 2, Section 6.0. The stack analyzer span must be capable of accommodating elevated emissions during startup.

An equivalent analyzer may be substituted for any reason.

Location	Manufacturer	Model Number	Range
Stack SO ₂	Ametek Photometric Analyzer (or equivalent)	920 (or equivalent)	Dual range: Normal: 0 – 500 ppm SO ₂ SSM: 0 – 3,600 ppm SO ₂
Stack O ₂	Ametek Oxygen Analyzer (or equivalent)	920 (or equivalent)	Single range: 0 – 20.9 % O ₂

Pt. 60, App. B, Spec. 2, Section 1.0 (Stack Analyzers)

Initial compliance certification required only if the analyzer is replaced or if system modifications require one to be performed. Additional detail and exceptions noted below under System Modifications below.

System Maintenance and Malfunction

Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the plant shall conduct monitoring in continuous operation during all Operating Hours as defined above.

In the event of a CEMS malfunction of greater than 24 hours:

- SO₂ in the exit stack gas will be sampled and analyzed at least once per hour, during all Operating Hours. Sampling will be conducted by Reich test or other method (e.g. portable analyzer).
- O₂ in the exit stack gas will be sampled and analyzed at least once per hour, during all Operating Hours. Sampling will be conducted by Orsat test or other method (e.g. portable analyzer)
- Compliance with the Short-Term Limit and Long-Term Limit shall be verified by using these data and Equations 2, 3, and 4 with the following exception. Given that one or both of the stack CEMS is out of service, the most recent hourly reading(s) will be substituted for the 12 (24) five-minute readings that would otherwise be taken if the system was operating normally

In the event of an analyzer malfunction, a like-kind replacement may be used while repairs are being made. A cylinder gas audit (CGA) must be performed on the replacement analyzer as soon as is practicable after it is placed in service. The daily calibration drift requirement would also apply to the replacement analyzer.

System Modifications

Significant replacement, modification, or change in certified CEMS equipment may require a complete recertification. If a recertification is required, it will be conducted within 90 days. Examples include:

- Change in location or orientation of the sampling probe or site
- Complete replacement of an existing continuous emission monitoring system.

When replacing components that can alter the physical characteristics or conditioning of the sample in the field, a CGA is required. The following activities will require a CGA to be performed before returning the analyzer to service.

- Replacement of the analyzer
- Detector replacement
- Replacement of equipment associated with the detector

The following activities are not expected to trigger a CGA. However, it is recommended that a Calibration Drift check be performed before returning to service.

- Filter replacement
- Data Recorder Repairs
- Tubing replacement

General guidance: When replacing components or devices that do not affect the physical characteristics or handling of the gas in the field such as data recorders, a CGA is not required. A calibration drift check normally should be conducted. If the repaired component affects the transport of the gas to the analyzer, such as replacing tubing, a leak check should be conducted.

Dated month day, 2011



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EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Number 19282 and PSDTX1081

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
101	Unit No. 8 Stack	CO	1.75	7.65
		H ₂ SO ₄ (6)	16.25	71.18
		NO _x	9.75	42.70
		PM	3.36	14.72
		PM ₁₀	3.36	14.72
		PM _{2.5}	3.36	14.72
		SO ₂	325.03	806.65
		Ag	0.022	0.095
		As	0.068	0.297
		Ba	0.023	0.099
		Be	0.014	0.063
		Cd	0.014	0.063
		Cl ₂	0.721	3.159
		Cr	0.077	0.337
		Hg	0.0004	0.002
		Ni	0.061	0.267
		Pb	0.032	0.141
102	Acid Pump Tank	Sb	0.037	0.158
		Se	0.044	0.192
		Tl	0.014	0.063
		SO ₂	0.01	0.01

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
103	Natural Gas Start Up Vent (8)	CO	4.12	
		NO _x	4.90	
		PM	0.37	
		PM ₁₀	0.37	
		PM _{2.5}	0.37	
		SO ₂	0.03	
		VOC	0.27	
105	Natural Gas Start Up Vent (8)	CO	4.12	
		NO _x	4.90	
		PM	0.37	
		PM ₁₀	0.37	
		PM _{2.5}	0.37	
		SO ₂	0.03	
		VOC	0.27	
106	Natural Gas Start Up Vent (8)	CO	4.12	
		NO _x	4.90	
		PM	0.37	
		PM ₁₀	0.37	
		PM _{2.5}	0.37	
		SO ₂	0.03	
		VOC	0.27	
	Annual Emission Cap (5) (EPNs 103, 105 and 106)	CO		0.31
		NO _x		0.37
		PM		0.03
		PM ₁₀		0.03
		PM _{2.5}		0.03
		SO ₂		0.01
		VOC		0.02
CATSCNU8	Catalyst Screening (7)	PM	0.01	0.01
		PM ₁₀	0.01	0.01
		PM _{2.5}	0.01	0.01

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
FE1	Process Fugitives (4)	SO ₂	0.01	0.03

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources use area name or fugitive source name.
- (3) Ag - silver
 As - arsenic
 Ba - barium
 Be - beryllium
 Cd - cadmium
 Cl₂ - chlorine
 CO - carbon monoxide
 Cr - chromium
 Hg - mercury
 H₂SO₄ - sulfuric acid mist
 Ni - nickel
 NO_x - total oxides of nitrogen
 Pb - lead
 PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
 PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
 PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter
 Sb - antimony
 Se - selenium
 SO₂ - sulfur dioxide
 Tl - thallium
 VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
- (4) Emission rate is an estimate and compliance is demonstrated by meeting the requirements of the applicable special conditions and permit application representations.
- (5) 150 hours of operation on a rolling 12-month basis for EPNs 103, 105 and 106.
- (6) PSDTX1081 pollutant.
- (7) Planned maintenance, startup and shutdown activity only
- (8) Planned startup activity only

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates * lb/hr	TPY**
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* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

Hrs/day 24 Days/week 7 Weeks/year 52

** Compliance with annual emission limits is based on a rolling 12-month period.

Dated month day, 2011

901
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TX

AIR, PESTICIDES, AND TOXICS 6TH FLOOR RECORDS CENTER INFILING / NEW FILE FORM

New File ☐

OR

Infiling ☒

Choose from the file types below:

AIR FACILITY:

- ☐ AR - Acid Rain
☐ CB - Confidential Business
☐ CO - Compliance
☐ EN - **Enforcement
☐ GE - General
☒ PE - Permit
☐ RA - Regulatory Applicability
☐ Other _____

TSCA:

- ☐ AH - Asbestos Hazard Emergency Response Act
☐ AS or AW - Asbestos or Asbestos Worker Protection
☐ CB - Confidential
☐ FI - Site Specific
☐ FO - Non Site Specific
☐ IM - **Section 5 & 8
☐ LB - **Lead
☐ PC - **PCB

** Extension of file type (if needed): ☐ ES - Enforcement Sensitive
☐ DO - Docket Number

EPCRA/SARA ☐

EPA Registry I.D.

Current FRS Number:
(Found in EnviroFacts)

110000460901

Facility Name & Physical Address:

Rhodia Inc.

8615 Manchester St.

Houston, TX, 77012 2142

Remarks:

Requestor's Name & Phone Number:

Les Koval

X6733

Program Management Files:

A current listing of these file types and their numeric codes are located in a blue binder on the top shelf of the "APT" file cabinet in the 9th Floor Records Center.

AIRS - Aerometric Information Retrieval System

ATO - Air Toxics

EMR - Emergency Response

ENF - Enforcement -

ENF 5-5-1 requires Month and Fiscal Year accompany file code.

ENF 5-6-5 requires Fiscal Year accompany file code.

EXR - External Relations

GEO - Geographical Summary Data

GRA - Grants Administration

The majority of this section requires the Fiscal Year accompany file code.

Project Officer Grants require the Grant number and Fiscal Year accompany file code.

LAB - Laboratory Support

LBP - Lead Based Paint

LBP 12-3 requires the facility name in which document refers to be either highlighted or circled on the top page.

LEL - Legal and Legislative

MON - Monitoring NES - National Emission Standards

NSP - New Source Performance

NSR - New Source Review

OPP - Operating Permits Program

PEA - Permits Administration Program

PES - Pesticides

PLA - Planning

PUA - Public Affairs

RAD - Radiation

RCR - Resource Conservation and Recovery Act - Regulatory Development

RDE - Research and Development

REG - Registration

SIP - State Implementation Plan

SUP - Superfund

TITL - Title III

TSC - Toxic Substance Control

TSC 1-1-4 requires the facility name in which document refers to be either highlighted or circled on the top page.

TSU - Technical Support

VRP - Voluntary Reduction Program

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



EPA

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 5, 2011

MR WILLIAM J MCCONNELL
PLANT MANAGER
RHODIA INC
8615 MANCHESTER ST
HOUSTON TX 77012-2142

Re: Prevention of Significant Deterioration Permit
Permit Numbers: 4802 and PSDTX1260
Regeneration Unit No 2
Houston, Harris County
Regulated Entity Number: RN100220581
Customer Reference Number: CN600125330

RECEIVED
11 DEC 13 PM 5:19
AIR PERMITS SECTION
6PD-R

Dear Mr. McConnell:

The executive director has completed the technical review of your application and has prepared a preliminary decision and draft permit.

You are now required to publish notice of your proposed activity. To help you meet the regulatory requirements associated with this notice, we have included the following items:

- Notices for Newspaper Publication (Examples A and B)
- Public Notice Checklist
- Instructions for Public Notice
- Affidavit of Publication for Air Permitting (Form TCEQ-20533) and Alternative Language Affidavit of Publication for Air Permitting (Form TCEQ-20534)
- Notification List
- Draft Permit

Please note that it is **very important** that you follow **all** directions in the enclosed instructions. If you do not, you may be required to republish the notice. A common mistake is the unauthorized changing of notice wording or font. If you have any questions, please contact us before you proceed with publication.

A "Public Notice Checklist" is enclosed which notes the time limitations for each step of the public notice process. This checklist should be used as a tool in conjunction with the enclosed, detailed instructions.

Mr. William J McConnell

Page 2

December 5, 2011

Re: Permit Numbers 4802 and PSDTX1260

If you do not comply with **all** requirements described in the instructions, further processing of your application may be suspended or the agency may take other actions.

If you have any questions regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300. If you have any other questions, please contact Mr. Stephen Anderson, P.E. at (512) 239-1287.

Sincerely,



Bridget C. Bohac

Chief Clerk

Office of the Chief Clerk

Texas Commission on Environmental Quality

BB/SEA

Enclosure

cc: Air Section Manager, Region 12 - Houston
Director, Environmental Public Health Division, Harris County Public Health and
Environmental Services, Pasadena
Bureau Chief Pollution Control & Prevention, Environmental Health Division, Houston
Department of Health and Human Services, Houston
Air Permits Section Chief, New Source Review, Section (6PD-R), U.S. Environmental
Protection Agency, Region 6, Dallas

Project Numbers: 166270 and 166724

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



EXAMPLE A

NOTICE OF APPLICATION AND PRELIMINARY DECISION FOR AN AIR QUALITY PERMIT

AIR QUALITY PERMIT NUMBERS: 4802 AND PSDTX1260

APPLICATION AND PRELIMINARY DECISION. Rhodia Inc., 8615 Manchester St, Houston, Texas 77012-2142, has applied to the Texas Commission on Environmental Quality (TCEQ) for amendment of Air Quality Permit 4802 and issuance of Prevention of Significant Deterioration (PSD) Air Quality Permit PSDTX1260, which would authorize construction of a caustic scrubber at the Regeneration Unit No 2 at 8615 Manchester St, Houston, Harris County, Texas 77012. This application was submitted to the TCEQ on June 6, 2011. The existing facility will emit the following air contaminants in a significant amount: sulfuric acid mist. In addition, the facility will emit the following air contaminants: organic compounds, nitrogen oxides, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less, sulfur dioxide, carbon monoxide, sulfuric acid, hydrogen chloride and chlorine.

The executive director has determined that the emissions of air contaminants from the proposed facility which are subject to PSD review will not violate any state or federal air quality regulations and will not have any significant adverse impact on soils, vegetation, or visibility. All air contaminants have been evaluated, and "best available control technology" will be used for the control of these contaminants.

The executive director has completed the technical review of the application and prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The permit application, executive director's preliminary decision, draft permit, and the executive director's preliminary determination summary and executive director's air quality analysis, will be available for viewing and copying at the TCEQ central office, the TCEQ Houston regional office, and at the Melcher Neighborhood Library, 7200 Keller Street, Houston, Harris County, Texas, beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review at the TCEQ Houston Regional Office, 5425 Polk St Ste H, Houston, Texas.

INFORMATION AVAILABLE ONLINE. These documents are accessible through the Commission's Web site at www.tceq.texas.gov/goto/cid: the executive director's preliminary decision which includes the draft permit, the executive director's preliminary determination summary, the air quality analysis, and, once available, the executive director's response to comments and the final decision on this application. Access the Commissioners' Integrated Database (CID) using the above link and enter the permit number for this application. The public location mentioned above provides public access to the internet. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. http://prs.tceq.texas.gov/crintprt/index.cfm?fuseaction=detail.addnIdDetail&addn_id=580791102002159&getall=no#.



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PUBLIC COMMENT/PUBLIC MEETING. You may submit public comments or request a public meeting about this application. The purpose of a public meeting is to provide the opportunity to submit comment or to ask questions about the application. The TCEQ will hold a public meeting if the executive director determines that there is a significant degree of public interest in the application, if requested by an interested person, or if requested by a local legislator. A public meeting is not a contested case hearing. **You may submit additional written public comments within 30 days of the date of newspaper publication of this notice in the manner set forth in the AGENCY CONTACTS AND INFORMATION paragraph below.**

After the deadline for public comment, the executive director will consider the comments and prepare a response to all public comment. **The response to comments, along with the executive director's decision on the application will be mailed to everyone who submitted public comments or is on a mailing list for this application.**

OPPORTUNITY FOR A CONTESTED CASE HEARING. A contested case hearing is a legal proceeding similar to a civil trial in a state district court. **A person who may be affected by emissions of air contaminants from the facility is entitled to request a hearing. A contested case hearing request must include the following: (1) your name (or for a group or association, an official representative), mailing address, daytime phone number, and fax number, if any; (2) applicant's name and permit number; (3) the statement "I/we request a contested case hearing;" (4) a specific description of how you would be adversely affected by the application and air emissions from the facility in a way not common to the general public; (5) the location and distance of your property relative to the facility; and (6) a description of how you use the property which may be impacted by the facility. If the request is made by a group or association, then one or more members who have standing to request a hearing and the interests the group or association seeks to protect must also be identified. You may also submit your proposed adjustments to the application/permit which would satisfy your concerns. Requests for a contested case hearing must be submitted in writing within 30 days following this notice to the Office of the Chief Clerk, at the address provided in the information section below.**

A contested case hearing will only be granted based on disputed issues of fact that are relevant and material to the Commission's decisions on the application. Further, the Commission will only grant a hearing on issues raised by you or others during the public comment period that have not been withdrawn. Issues that are not raised in public comments may not be considered during a hearing.

EXECUTIVE DIRECTOR ACTION. If a timely contested case hearing request is not received or if all timely contested case hearing requests are withdrawn, the executive director may issue final approval of the application. The response to comments, along with the executive director's decision on the application will be mailed to everyone who submitted public comments or is on a mailing list for this application, and will be posted electronically to the CID. If any timely hearing requests are received and not withdrawn, the executive director will not issue final approval of the permit and will forward the application and requests to the Commissioners for their consideration at a scheduled commission meeting.

MAILING LIST. You may ask to be placed on a mailing list to obtain additional information on this application by sending a request to the Office of the Chief Clerk at the address below.

AGENCY CONTACTS AND INFORMATION. Public comments and requests must be submitted either electronically at www.tceq.texas.gov/about/comments.html, or in writing to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. If you communicate with the TCEQ electronically, please be aware that your email address, like your physical mailing

address, will become part of the agency's public record. For more information about this permit application or the permitting process, please call the Public Education Program toll free at 1-800-687-4040. Si desea información en Español, puede llamar al 1-800-687-4040.

Further information may also be obtained from Rhodia Inc at the address stated above or by calling Mr. Floyd Dickerson, Environmental Manager at (713) 924-1408.

Notice Issuance Date: December 5, 2011

Example B

Publication Elsewhere in the Newspaper:

TO ALL INTERESTED PERSONS AND PARTIES:

Rhodia Inc. has applied to the Texas Commission on Environmental Quality (TCEQ) for amendment of Air Quality Permit Number 4802 and issuance of Prevention of Significant Deterioration (PSD) Air Quality Permit PSDTX1260, which would authorize construction of a caustic scrubber at the Regeneration Unit No 2 at 8615 Manchester St, Houston, Harris County, Texas 77012. Additional information concerning this application is contained in the public notice section of this newspaper.

3"
minimum

← Minimum 2 column widths or 4 inches →

Public Notice Checklist
Notice of Application and Preliminary Decision for an Air Quality Permit
(2nd Notice)

The following tasks must be completed for public notice. If publication in an alternative language is required, please complete the tasks for both the English and alternative language publications. Detailed instructions are included in the "Instructions for Public Notice" section of this package.

Within 33 calendar days after date of this letter

Publish *Notice of Application and Preliminary Decision for an Air Quality Permit* in the same newspaper(s) in which you published *Notice of Receipt of Intent to Obtain Permit* for this application.

- Example A must be published in "public notice" section of newspaper. Review for accuracy prior to publishing.
- Example B (if applicable) must be published in prominent location (other than "public notice") in same issue of newspaper

Provide copy of the complete application, the executive director's preliminary decision (including the draft permit), and the executive director's preliminary determination summary and executive director's air quality analysis, including any revisions, at a public place for review and copying. Keep them there for duration of the designated comment period. The public place should provide public access to the internet.

First day of newspaper publication

Review published newspaper notice for accuracy. If errors, contact Air Permits Division.

Ensure copy of the complete application (including any subsequent revisions) and the executive director's preliminary decision (including the draft permit) are at the public place.

Within 10 business days after date of publication

Mail original newspaper clippings showing publication date and newspaper name to:

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Mail photocopies of newspaper clippings showing publication date and newspaper name to persons listed on *Notification List*.

Within 30 calendar days after date of publication

Mail original affidavit of publication for air permitting and alternative language affidavit of publication for air permitting (if applicable) to:

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Mail photocopies of affidavits to persons listed on *Notification List*.

Within 10 business days after end of the designated comment period

Mail Public Notice Verification Form to:

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Mail photocopies of Public Notice Verification Form to persons listed on *Notification List*.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



Instructions for Public Notice For New Source Review & Prevention of Significant Deterioration Air Permit

Notice of Application and Preliminary Decision

We have completed the technical review of your application and issued a preliminary decision. You must comply with the following instructions:

Review Notice

Included in the notice is all of the information which the commission believes is necessary to effectuate compliance with applicable public notice requirements. Please read it carefully and notify the Texas Commission on Environmental Quality (TCEQ) immediately if it contains any errors or omissions. You are responsible for ensuring the accuracy of all information published. You may not change the text of the notice without prior approval from the TCEQ.

Newspaper Notice

- You must publish the enclosed *Notice of Application and Preliminary Decision for an Air Quality Permit* within **33 calendar days** after the date this information was mailed to you (see date of letter).
- You must publish the enclosed *Notice of Application and Preliminary Decision for an Air Quality Permit* at your expense, in the same newspaper(s) in which you published the *Notice of Receipt and Intent to Obtain Permit* for this application. The newspaper must be a newspaper that is of general circulation in the municipality where the facility is or will be located. If the facility is not located within a municipality, the newspaper must be of general circulation in the municipality nearest the location.
- You must publish this notice in one issue of any applicable newspaper.
- You will find two example notices enclosed in this package. *Example A* must be published in the "public notice" section of the newspaper. The phrase "Example A" is not required to be published. *Example B* must be published in the **same issue** of the newspaper as *Example A*; however, it must be published in a prominent location (other than the public notice section). *Example B* refers the public to the "public notice" section of the newspaper where *Example A* provides more information regarding the permit application.

- *Example B* must be a total of at least **6 column inches (standard advertising units)** with a height of at least **3 inches** and a horizontal dimension of **2 column widths**. If the newspaper chosen does not use standard advertising units for measurement, the notice must be at least **12 square inches** with the shortest side of at least **3 inches**.
- The bold text of the enclosed notice **must** be printed in the newspaper in a font style or size that distinguishes it from the rest of the notice (i.e., **bold, italics**). **Failure to do so may require re-notice.**

Alternative Language Notice

In certain circumstances, applicants for air permits must complete notice in alternative languages.

- Public notice rules require the applicant to determine whether a bilingual program is required at either the elementary or middle school nearest to the facility or proposed facility location. Bilingual education programs are determined on a district-wide basis. When students who are required to attend either school are eligible to be enrolled in a bilingual education program, some alternative language notice is required (newspaper notice).
- Since the school district, and not the schools, must provide the bilingual education program, these programs do not have to be located at the elementary or middle school nearest to the facility or proposed facility to trigger the alternative language notice requirement. If there are students who would normally attend the nearest schools eligible to be taught in a bilingual education program at a different location, alternative language notice is required.
- If triggered, publications of alternative language notices must be made in a newspaper or publication printed primarily in each language taught in the bilingual education program. The same newspaper(s) used for *Notice of Receipt and Intent to Obtain Permit* must be used for publication of the *Notice of Application and Preliminary Decision for an Air Quality Permit*. This notice is required if such a newspaper or publication exists in the municipality or the county where the facility is or will be located.
- The applicant must demonstrate a good faith effort to identify a newspaper or publication in the required language. If a newspaper or publication of general circulation published at least once a month in such language cannot be found, publishing in that language is not required, but signs must still be posted adjacent to each English language sign.
- Publication in an alternative language section or insertion within an English language newspaper does not satisfy these requirements.
- The applicant has the burden to demonstrate compliance with these requirements. You must fill out the ***Public Notice Verification Form (Form TCEQ-20244)*** indicating your compliance with the requirements regarding publication in an alternative

language. **This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**

- It is suggested the applicant work with the local school district to do the following:
 - (a) determine if a bilingual program is required in the district;
 - (b) determine which language is required by the bilingual program;
 - (c) locate the nearest elementary and middle schools; and
 - (d) determine if any students attending either school are entitled to be enrolled in a bilingual educational program.
- **If you determine that you must meet the alternative language notice requirements, you are responsible for ensuring that the publication in the alternative language is complete and accurate in that language.** Since the most common bilingual programs are in Spanish, the TCEQ has provided example Spanish notice templates for your use. All italic notes should be replaced with the corresponding Spanish translations for the specific application and published in the alternative language publication. Electronic versions of the Spanish templates are available through the Air Permits Division Web site at www.tceq.texas.gov/goto/air/publicnotice.
- If you are required to publish notice in a language other than Spanish, you must translate the entire public notice at your own expense.

Public Comment Period

- The public comment period will last at least **30 calendar days after publication of the last notice.**
- The comment period will be longer if the last day of the public comment period ends on a weekend or a holiday. In this case, the comment period will end on the next business day.
- The comment period for the permit may lengthen depending on whether a public meeting is held. If a public meeting is held, the comment period will be extended to the later of either the date of the public meeting or the end of the second notice period.

Proof of Publication

- Check each publication to ensure that the articles were accurately published. If a notice was not published correctly you may be required to republish.
- For each newspaper in which you published, you must submit **original newspaper clippings or tear sheets** of each published notice which shows the complete notice that was published, the date of publication, and the name of the newspaper to the Office of the Chief Clerk within **10 business days** after the date of publication.
- You must submit an **original affidavit of publication for air permitting and alternate language affidavit of publication for air permitting (if applicable)** to the

Office of the Chief Clerk within **30 calendar days** after the date of publication. **You must use the enclosed affidavits of publication.** The affidavits must clearly identify the applicant's name and permit number. You are encouraged to submit the affidavit with the original newspaper clippings described above.

- You must submit the ***Public Notice Verification Form (Form TCEQ-20244)*** to the Office of the Chief Clerk within **10 business days** of the end of this public comment period. You must use this form to certify that you have met bilingual notice requirements. **This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**
- **The original affidavits of publication, *Public Notice Verification Form*, and original newspaper clippings of the published notices must be mailed to:**

Texas Commission on Environmental Quality

Office of the Chief Clerk, MC-105

Attn: Notice Team

P.O. Box 13087

Austin, Texas 78711-3087

- Please ensure that the affidavit and newspaper clippings you send to the Chief Clerk are originals and that all blanks on the affidavit are filled in correctly. Photocopies of newspaper clippings and affidavits will not be accepted.
- Photocopies of newspaper clippings, affidavits, and verifications must also be sent to those listed on the enclosed *Notification List* within the deadlines specified above.

Failure to Publish and Submit Proof of Publication

You must meet all publication requirements. **If you fail to publish the notice or submit proof of publication *on time***, the TCEQ may suspend further processing on your application or take other actions.

Sign Posting

Signs must remain in place and be legible and be visible from the street for the entire duration of the comment period, from the beginning of the *Notice of Receipt and Intent* until the close of the comment period after publication of the *Notice of Application and Preliminary Decision*.

Application in a Public Place

- You must provide a copy of the complete application, the executive director's preliminary decision (including the draft permit), the executive director's preliminary determination summary and the executive director's air quality analysis, (including any subsequent revisions), at a public place for review and copying by the public. This place must be in the county in which the facility is located or proposed to be located.

- A public place is one that is publicly owned or operated (ex: libraries, county courthouses, or city halls). Location selected must provide public access to the internet.
- This copy must be accessible to the public for review and copying. The copy must be available beginning on the first day of newspaper publication and remain in place until the commission has taken action on the application or the commission refers issues to the State Office of Administrative Hearings.
- If the application is submitted to the TCEQ with information marked as "CONFIDENTIAL," you are required to indicate which specific portions of the application are not being made available to the public. These portions of the application must be accompanied with the following statement: "Any request for portions of this application that are marked as confidential must be submitted in writing, pursuant to the Public Information Act, to the Texas Commission on Environmental Quality, Public Information Coordinator, MC-197, P.O. Box 13087, Austin, Texas 78711-3087."
- You must submit verification of file availability using the ***Public Notice Verification Form (Form TCEQ-20244)*** within **10 business days** after end of the publications' designated comment period. Do not submit the form verifying that the application was in a public place until after the comment period is complete. If a public meeting is held or second notice is required causing the public comment period to be extended, at a later date you will be required to verify that the application was in a public place during the entire public comment period. **This form is available at www.tceq.texas.gov/permitting/air/nav/air_publicnotice.html.**

General Information

When contacting the Commission regarding this application, please refer to the permit number at the top of the *Notice of Application and Preliminary Decision*.

If you have questions or need assistance regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300 or the project reviewer listed in the cover letter.

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Rhodia

Permit No.: 4802 and PSDTX1260.

AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS

§

COUNTY OF _____

§

Before me, the undersigned authority, on this day personally appeared

_____, who being by me duly sworn,
(name of newspaper representative)

deposes and says that (s)he is the

(title of newspaper representative)

of the _____; that said newspaper is generally circulated
(name of newspaper)

in _____, Texas;
(in the municipality or nearest municipality to the location of the facility or the proposed facility)

that the attached notice was published in said newspaper on the following date(s):

(newspaper representative's signature)

Subscribed and sworn to before me this the _____ day of _____, 20____,

to certify which witness my hand and seal of office.

Notary Public in and for the State of Texas

(Seal)

Print or Type Name of Notary Public

My Commission Expires

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Rhodia Inc.

Permit No.: 4802 and PSDTX1260

ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS

§

COUNTY OF _____

§

Before me, the undersigned authority, on this day personally appeared

_____, who being by me duly sworn, deposes
(name of newspaper or publication representative)

and says that (s)he is the _____

(title of newspaper or publication representative)

of the _____; that said newspaper or publication is generally circulated
(name of newspaper or publication)

in _____, Texas;
(in the municipality or the same county as the location of the facility or the proposed facility)

that the attached notice was published in said newspaper or publication on the following date(s):

(newspaper or publication representative's signature)

Subscribed and sworn to before me this the _____ day of _____, 20____.

to certify which witness my hand and seal of office.

Notary Public in and for the State of Texas

(Seal)

Print or Type Name of Notary Public

My Commission Expires

Notification List

It is the responsibility of the applicant to furnish the following offices with copies of the notices published, the *Affidavit of Publication for Air Permitting*, the *Alternative Language Affidavit of Publication for Air Permitting (if applicable)*, and a completed copy of the *Public Notice Verification Form (Form TCEQ-20244)*. Originals should be sent to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. **Copies** should be sent to the following:

U.S. Environmental Protection Agency
Region 6
Attn: Air Permits Section (6PD-R)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Texas Commission on Environmental Quality
Houston Regional Office
5425 Polk St Ste H
Houston, Texas 77023-1452

Texas General Land Office
Upland Leasing Team Leader
Professional Services
P.O. Box 12873
Austin, Texas 78711-2873

Texas Commission on Environmental Quality
Office of Air
Air Permits Division, MC-163
Mr. Stephen Anderson, P.E.
P.O. Box 13087
Austin, Texas 78711-3087

Bureau Chief Pollution Control & Prevention
Environmental Health Division
Houston Department of Health and Human
Services
7411 Park Place Blvd
Houston, Texas 77087-4441

Director
Environmental Public Health Division
Harris County Public Health and
Environmental Services
101 S Richey St Ste G
Pasadena, Texas 77506

SPECIAL CONDITIONS

Permit Number 4802/PSDTX1260

Emission Standards

1. This permit authorizes emissions only from those points listed in the attached table entitled "Emission Sources- Maximum Allowable Emission Rates" (MAERT), and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating conditions specified in this permit.
2. Complaints from affected persons of nuisance odors from the site verified by the Texas Commission on Environmental Quality (TCEQ) or any air pollution control agency with appropriate jurisdiction shall be the basis for requiring prompt remedial action to eliminate such odors. The TCEQ may require these facilities to implement one or more of the following measures: temporary production curtailment; temporary shutdown during adverse meteorological conditions; install any additional controls that are necessary to control odor emissions, etc. according to a schedule determined by TCEQ. (08/10)
3. The sulfur dioxide (SO₂) emissions from Regeneration Unit No. 2 shall not exceed 15 tons measured over any continuous 24-hour period prior to April 1, 2014. The holder of this permit shall maintain equipment as described in its permit application which will automatically cause the operation of Regeneration Unit No. 2 to cease if the SO₂ emissions exceed for a 30-minute period at a rate which would cause more than 15 tons of SO₂ to be emitted over a 24-hour period prior to April 1, 2014. (x/12)

SO₂ emission limits will be limited to the following emission rates: (x/12)

Short term: 3.0 pounds of SO₂ per ton of one hundred percent acid produced.

Long term: 1.8 pounds of SO₂ per ton of one hundred percent acid produced.

Long term SO₂ emission limits will become effective 365 days from April 1, 2014.

H₂SO₄ mist is limited to 0.15 pound per ton of produced H₂SO₄ on an hourly maximum basis and 0.10 pounds per ton of produced H₂SO₄ on an annual average basis prior to April 1, 2014 from EPN 104. EPN 104 shall be permanently shut down prior to April 1, 2014. H₂SO₄ mist is limited to 0.15 pound per ton of produced H₂SO₄ on an hourly maximum basis and 0.10 pounds per ton of produced H₂SO₄ on an annual average basis on and after April 1, 2014 from EPN 104 upon installation completion of the proposed emission abatement equipment. New EPN 104 shall be operable on and after April 1, 2014. (x/12) (PSD)

Failure to install this emission abatement equipment by April 1, 2014 shall require operation of these permitted facilities to cease and these permitted facilities shall not operate until this abatement equipment is installed and operating properly. (x/12) (PSD)

SPECIAL CONDITIONS

Permit Number 4802/PSDTX1260

Page 2

H₂SO₄ production is limited 969 tons per day prior to completion of installation and operation of the represented emission abatement equipment pursuant to this special condition. The increase in H₂SO₄ production to 1,150 tons per day shall not be effective until all represented emission abatement equipment required by this special condition is completely installed and operating properly. (x/12) (PSD)

The holder of this permit shall keep records of the daily production of H₂SO₄ and the one-hour SO₂ emissions rates for each day before and after completion of installation of the emission abatement equipment required by this special condition. Records shall be made readily available to TCEQ personnel upon request, EPA personnel or any applicable local program with jurisdiction and may be used to determine compliance with the SO₂ emissions limitations specified in the maximum allowable emissions rates table (MAERT). (x/12) (PSD)

4. Opacity of emissions from the Unit No. 2 Stack shall not exceed 20 percent averaged over a five-minute period up to April 1, 2014.

Federal Program Requirements

5. These facilities shall comply with all applicable requirements shall comply with all applicable requirements of EPA regulations on Standards of Performance for New Stationary Sources promulgated for the following. (x/12)

- A. Emission Guidelines and Compliance Times for Sulfuric Acid Production Units in 40 CFR 60, Subparts A and Cd.
- B. Standards of Performance for Sulfuric Acid Plants in 40 CFR 60, Subparts A and H.
- C. Volatile Organic Liquid Storage Vessels in 40 CFR Part 60, Subparts A and Kb only apply to Storage Tanks 48, 49, 53, B1 and B2.

These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on National Emission Standards for Hazardous Air Pollutants promulgated for Benzene Waste Operations in Title 40 Code of Federal Regulations (40 CFR) Part 61, Subparts A and FF.

These facilities shall comply with all applicable requirements of Title 30 Texas Administrative Code (30 TAC) § 113.120 (including the referenced requirements contained in 40 CFR Part 63, Subpart G, § 113.550 (including the referenced requirements contained in 40 CFR Part 63 Subpart XX) and 113.640 (including the referenced requirements contained in 40 CFR Part 63, Subpart GGG). (12/08)

SPECIAL CONDITIONS

Permit Number 4802/PSDTX1260

Page 3

Operational Requirements

6. The No. 2 regeneration heater is limited to 1,000 hours per rolling 12-months of operation. Fuel for this heater is limited to pipeline-quality, sweet natural gas as defined in 30 TAC Chapter 101. Records shall be updated quarterly to demonstrate compliance with this special condition.
 7. The use of compounds at the Regeneration Unit No. 2 (EPN 104) is limited to those identified in the attached Approved Chemical List. Modifications or construction of new facilities at this site that result in emission increases of one or more chemicals in the Approved Chemical List dated December 2008, or from chemicals currently in use and previously authorized through this special condition can only be approved through use of this special condition. Any construction of new equipment that occurs through the use of adding a new chemical is not allowed through this special condition. New chemical(s) may also be added through use of a permit by rule claim and/or registration under 30 TAC Chapter 106 or use of the qualified facilities requirements in 30 TAC Chapter 116. (12/08)
 - A. Short-term (pounds per hour [lb/hr]) and annual (tons per year) emissions and calculations shall be completed for each chemical at each affected source; emission rates shall be calculated in accordance with the methods documented in the permit amendment application (PI-1, dated September 4, 2003). The calculated emission rates shall not exceed the maximum allowable emission rate at any emission point.
 - B. The Effect Screening Level (ESL) for the chemical shall be obtained from the current Texas Commission on Environmental Quality (TCEQ) ESL list or by written request to the TCEQ Toxicology Section.
 - C. The total emissions of any compound from all emission points in this permit must satisfy one of the following conditions:
 - (1) The total maximum emission rate from all sources is less than 0.04 lb/hr and the ESL greater than 2 ug/m³; or
 - (2) Case specific criteria based on modeling performed on July 30, 2004.
- $$(ER/ESL)_N \leq (ER/ESL)_E$$

SPECIAL CONDITIONS

Permit Number 4802/PSDTX1260

Page 4

$(ER/ESL)_N$ = plant-wide maximum hourly emission rate based on maximum vapor pressure of new compound(s) divided by its ESL.

$(ER/ESL)_E$ = the highest ratio of any previously authorized compounds plant-wide hourly emission rate based on maximum vapor pressure divided by its ESL (i.e., 0.261).

D. The permit holder shall maintain records of the information below and the demonstrations in steps A through C above. The following documentation is required for each compound:

- (1) Chemical name(s), composition, and chemical abstract registry number if available.
- (2) Molecular weight.
- (3) Storage tanks, loading areas, and loading fugitive areas where the material is to be handled and the emission control device to be utilized.
- (4) Date new compound handling commenced.
- (5) Material Safety Data Sheet.
- (6) A copy of the referenced July 2004 modeling report shall be kept on-site and made available to TCEQ personnel and any local air pollution program with jurisdiction.

Planned Maintenance, Startup and Shutdown (MSS)

8. A. This permit authorizes emissions from spent sulfuric acid (H_2SO_4) Storage Tanks 48, 49, 53 and 56 and from four spent H_2SO_4 storage tank truck depressurizations in any one hour and 12,786 spent H_2SO_4 storage tank truck depressurizations in any rolling 12 months when the Regeneration Unit No. 2 Furnace, EPN 104, is shut down for the following planned maintenance, start-up, and shutdown (maintenance, start-up and shutdown) activities: **(08/10)**

Planned unit shut down for process equipment gas leak repairs, planned maintenance turnarounds and general plant preventative planned maintenance shutdowns up to a maximum of 1,314 hours per rolling 12 months.

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During these planned downtime events, the emissions from the listed fixed-roof storage tanks and spent tank truck depressurizing activities shall be routed to the existing caustic scrubber and then directed to the inlet of Vapor Combustor, EPN 170, up to 1,314 hours per rolling 12-months.

A maximum of eight railcars can be depressurized at any one time, and the depressurizing vent stream(s) shall be vented to the No. 2 Regeneration Furnace designated as EPN 104 and can be directed to the caustic scrubber and then vented from the caustic scrubber to the Vapor Combustor identified as EPN 170 when the No. 2 Regeneration Furnace is down. The number of railcars depressurized in a rolling 12-month period is limited to 910 and shall be vented to the No. 2 Regeneration Furnaces designated as EPN 104 and can be directed to the caustic scrubber and then vented from the caustic scrubber to a Vapor Combustor identified as EPN 170 when the No. 2 Regeneration Furnace is down up to 1,314 hours per calendar year. (x/12)

The Vapor Combustor, EPN 120, shall receive waste gas streams when the Regeneration Unit No. 2 Furnace is not operating up to 1,314 hours per rolling 12-month period. A maximum of two hazardous waste tank trucks can be depressurized in any one hour and 550 truck depressurizations in any rolling 12-month period and vented to the No. 2 Regeneration Furnaces designated as EPN 104 and can be directed to the Vapor Combustor designated as EPN 120 when EPN 104 is down up to 1,314 hours per calendar year.

A maximum of two hazardous waste railcars can be depressurized in any one hour and 65 railcar depressurizations in any rolling 12-month period and vented to the No. 2 Regeneration Furnaces designated as EPN 104 and can be directed to the Vapor Combustor designated as EPN 120 when EPN 104 is down up to 1,314 hours per calendar year.

Emissions from planned unit shutdown for process gas leak repairs at EPN 104 planned maintenance turnarounds at EPN 104 and general plant preventative planned maintenance shutdowns at EPN 104 will be directed to EPN 120 up to a maximum of 1,314 hours per rolling 12-months.

- B. This permit authorizes emissions from EPNs 170, TKINSPMSS1, and TKINSPMSS2 for the following planned MSS activities at Storage Tanks 48, 49, 53, 56, and 78. (08/10)

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A maximum of three inspections can be conducted for the group of spent acid Storage Tanks designated as 48, 49, 53, and 56 each calendar year and a maximum of two inspections can be conducted for spent acid Storage Tank 78 each calendar year. Any liquid or solid residual from each storage tank will be removed prior to or after each tank is degassed. The represented tank degassing is limited to 1,032 hours per rolling 12 months.

Any gas or vapor removed from process equipment or storage vessels must be routed to the Regeneration Unit No. 2 caustic scrubber for removal of sulfur dioxide at 99.9 percent immediately followed by the vapor combustor designated as EPN 170 for control of volatile organic compounds (VOC) at 98.0 percent (option one) or alternatively to a portable caustic scrubber for removal of SO₂ at 99.0 percent immediately followed by a portable vapor combustor for VOC destruction at 98.0 percent (option two). The portable caustic scrubber pH shall be kept at a minimum of 9.0 and shall be monitored once a day. A sufficient inventory of fresh caustic shall be kept on site during the use of the portable caustic scrubber when each storage tank undergoes a planned MSS activity.

Option one controls shall not be used to degas Storage Tank 78. Options one and two operating time is each limited to 360 hours per rolling 12 months for Storage Tanks 48, 49, 53, and 56. Option two operating time is limited to 672 hours per rolling 12 months for Storage Tank 78.

Option one or option two control must be maintained until the VOC concentration is less than 34,000 parts per million volume (ppmv) as methane in the storage tank undergoing planned MSS. Each represented storage tank shall be degassed using good engineering practice to ensure air contaminants are removed from the system through the designated option one and/or option two represented emission controls to the extent allowed by process equipment or storage vessel design. The locations and/or identifiers where the purge or liquid flush material enters the storage vessel and the exit points for the exhaust gases shall be recorded.

- C. This permit authorizes emissions from EPNs (MSS-HAZTK1 and MSS-HAZTK2) for the following planned MSS activities at Hazardous Waste Tanks (B1, B2, F2, F3, H1 and H2) and bullet tank T554: (12/08)

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A maximum of two shutdowns, degassing, and cleaning events can be conducted for Tanks F2, F3, and T554 and two shutdowns, degassing, and cleaning events for tanks the equivalent size of Tanks B1 or B2 and two shutdowns, degassing, and cleaning events for tank the equivalent size of H1 or H2 each calendar year. These tank MSS activities are limited to 840 hours per rolling 12 months.

Each tank will be degassed to EPN 104, prior to being drained and flushed. Each tank will be drained and flushed by water a minimum of three times and emissions must be routed to the Regeneration Unit No. 2 Industrial Furnace (EPN 104) until the VOC concentration is less than 400 ppmv. If the Industrial Furnace (EPN 104) is not available, then these emissions must be routed to the vapor combustor, EPN 120. The vapor combustor must achieve 98 percent control efficiency for VOC and the industrial furnace must achieve 99.9999 percent control efficiency for VOC. Any wastewater will be pumped into another hazardous waste storage tank and will be burned in the industrial furnace in Regeneration Unit No. 2 (EPN 104). The outlet VOC concentration from the tanks after final nitrogen purge shall be below 20 ppmv. The purge rate of the blower shall not exceed 500 CFM at ambient temperature.

D. Catalyst converter planned MSS activity is limited to 218 hours per rolling twelve months from EPN CATSCNR2. Planned MSS generated particulate emissions shall be directed to a bag filter. Outlet bag filter grain loading shall be limited to a maximum of 0.01 grains per dry standard cubic foot. (x/12)

E. Only these planned MSS activities described in this condition are authorized by this permit. These emissions are subject to the maximum allowable emission rates indicated on the maintenance, start-up, and shutdown (MAERT). The performance of each planned maintenance activity and emissions associated with it shall be recorded and the rolling 12-month emissions shall be updated on a monthly basis. These records shall include at least the following information: (x/12)

- (1) the physical location at which emissions from the planned MSS activity occurred, including the emission point number, common name, and any other identifier for the point at which the emissions were released into the atmosphere;
- (2) the type of planned MSS activity and the reason for the planned activity;
- (3) the common name and the facility identification number of the facilities at which the planned MSS activity and emissions occurred;
- (4) the date and time of the planned MSS activity and its duration;

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- (5) the estimated quantity of each air contaminant, or mixture of air contaminants, emitted with the data and methods used to determine it. The emissions shall be estimated using the methods identified in the amendment application, PI-1 dated December 15, 2006, December 17, 2007 and May 31, 2011, consistent with good engineering practice.

Process Fugitive Monitoring Programs

9. 28PI Piping, Valves, Pumps and Compressors in Spent H₂SO₄ and SO₂ Service (2/07)

- A. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National Standards Institute, American Petroleum Institute, American Society of Mechanical Engineers, or equivalent codes.
- B. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical.
- C. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation. Non-accessible valves, as defined in 30 TAC Chapter 115, shall be identified in a list to be made available upon request.
- D. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve. Except during sampling, the second valve shall be closed.
- E. All piping components shall be inspected by visual, audible, and/or olfactory means at least once a week by operating personnel walk-through.
- F. Damaged or leaking valves, connectors, compressor seals, and pump seals found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Every reasonable effort shall be made to repair a leaking component as specified in this paragraph within 15 days after the leak is found. If the repair of a component would require a unit shutdown, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot

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be repaired until a scheduled shutdown shall be identified for such repair by tagging. At the discretion of the TCEQ Executive Director or designated representative, early unit shutdown or other appropriate action may be required based on the number and severity of tagged leaks awaiting shutdown.

- G. Date and time of each inspection shall be noted in the operator's log or equivalent. Records shall be maintained at the plant site of all repairs and replacements made due to leaks. These records shall be made available to representatives of the TCEQ upon request.

Piping, Valves, Connectors, Pumps and Compressors in VOC Service for Hazardous Waste Operations

10. The permittee shall comply with these requirements for all equipment items, except relief valves, which contact hazardous or specified non-hazardous wastes or vapors from these wastes:

- A. All valves and piping shall be above ground and so located as to be reasonably accessible for leak checking during plant operation.
- B. Piping connections shall be welded or flanged. Flanges and flange gaskets shall be of the design and quality that the potential for fugitive losses is minimized.
- C. All pumps shall be sealless or equipped with double mechanical seals using an oil or water based barrier fluid which operates at a pressure higher than the process pressure.
- D. All valves shall be designed, constructed, and tested by the manufacturer for leak-free performance.
- E. New and reworked valves installed as replacements shall be tested prior to operation by hydrostatic or gas testing in-place or by an appropriate bench test to determine that the valves do not leak.
- F. Prior to the initial burning of hazardous waste and annually thereafter, all pumps, valves, and flanges shall be hydrotested or gas-tested at 100 percent or more the maximum operating pressure and adjustments made as necessary to obtain bubble-tight, leak-free performance.

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- G. All pumps, valves, and flanges shall be monitored monthly with a hydrocarbon gas analyzer. Monitored values which are greater than 25 parts per million (ppm) above any background concentration when measured at a distance of less than three inches shall be considered evidence of a leak.

- (1) In lieu of the monthly monitoring frequency specified in Special Condition No. 9G, pumps, valves, and flanges may be monitored on a quarterly basis if the leak percentages of these components for three consecutive monthly monitoring periods is less than 0.2 percent.

If the leak percentage for any quarterly monitoring period is 0.2 percent or greater, the facility shall revert to monthly monitoring for pumps, valves, and flanges until the facility again qualifies for the alternative monitoring schedules previously outlined in this paragraph.

- (2) The leak percentage shall be determined by using the following formula:

$$(Cl_1 + Cs_1) \times 100 / Ct_1 = Cp_1$$

Where:

Cl_1 = the number of pumps, valves, and flanges found leaking by the end of the monitoring period.

Cs_1 = the number of pumps, valves, and flanges for which repair has been delayed and are listed on the facility shutdown log.

Ct_1 = the total number of pumps, valves, and flanges in the facility subject to the monitoring requirements, as of the last day of the monitoring period.

Cp_1 = the percentage of leaking pumps, valves, and flanges for the monitoring period.

- H. All agitator seals shall be monitored monthly with a hydrocarbon gas analyzer. Monitored values which are greater than 25 ppm above any background concentration when measured at a distance of less than three inches shall be considered evidence of a leak.

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- (1) In lieu of the monthly monitoring frequency specified Special Condition No. 9H agitator seals may be monitored on a quarterly basis if the leak percentages of these components for three consecutive monthly monitoring periods is less than 0.2 percent.

If the leak percentage for any quarterly monitoring period is 0.2 percent or greater, the facility shall revert to monthly monitoring for agitator seals until the facility again qualifies for the alternative monitoring schedules previously outlined in this paragraph.

- (2) The leak percentage used in paragraph H(1) shall be determined using the following formula:

$$(Cl_2 + Cs_2) \times 100 / Ct_2 = Cp_2$$

Where:

Cl_2 = the number of agitator seals found leaking by the end of the monitoring period

Cs_2 = the number of agitator seals for which repair has been delayed and are listed on the facility shutdown log.

Ct_2 = the total number of agitator seals in the facility subject to the monitoring requirements, as of the last day of the monitoring period.

Cp_2 = the percentage of agitator seals for the monitoring period.

- I. All agitator seals, pumps, valves, and flanges shall be inspected on a daily basis and shall be monitored if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method. Monitored values which are greater than 25 ppm above any three inches shall be considered evidence of a leak. Visible presence of the leaking waste liquid shall always constitute a leak and, therefore, will not necessitate the use of a monitor for detection purposes.
- J. Two continuous ambient hydrocarbon monitors shall be installed, maintained and operated around the perimeter of each of the storage modules for the purpose of identifying fugitive leaks. Each monitor shall alarm at: (4/07)

- (1) Calculated hourly averages above 25 ppm; or
- (2) An instantaneous value above 25 ppm; and
- (3) An alarm shall result in both an immediate search for leaking equipment by personnel using portable monitors and a written record of the conclusion of that search.

If the hourly average remains above 25 ppm and the initial search was negative, additional searches need not be conducted except on 24-hour intervals.

Alternate, equivalent methods or additions to these required methods for identifying fugitive leaks may be approved by the Executive Director of the TCEQ upon written request by the permittee.

Hand held monitors meeting Method 21 monitoring requirements can be used to monitor for process fugitive leaks during periods when the hydrocarbon monitors are out of service.

- K. Leaking equipment shall be repaired or isolated within four hours after detection, except for valves connected directly to tanks, which are allowed four hours after the affected tank has been emptied and decontaminated. Emptying and decontamination of the affected tank shall be initiated immediately after the detection of a leak. Equipment shall not be returned to service until the leak is repaired.

- L. The repair and maintenance of any equipment component shall be assisted by use of a hydrocarbon gas analyzer such that a minimum concentration of leaking hydrocarbons is achieved and that the resulting concentration is less than 25 ppm above any background concentration when measured at a distance of less than three inches. An acceptable alternative of demonstrating VOC to be less than 25 ppm is to pressure test with nitrogen up to 125 pounds per square inch. If there is no drop in pressure over a 15 minute period, the equivalent 25 ppm threshold is satisfied.

- M. The holder of this permit shall operate and maintain all portable hydrocarbon gas analyzers to meet the performance specifications, field tests, and calibrations as found in 40 CFR § 264.1063. Alternate, equivalent equipment items, operating modes, and maintenance activities may be approved by the Executive Director of the TCEQ upon written request by the permittee.

- N. Records of monitoring and maintenance actions, required by the Special Condition No. 9 of this permit shall be maintained for a period of three years,

shall be made available to authorized state and local air pollution control agencies, and shall include, at a minimum, the following data:

- (1) A list of all components affected by this special condition;
- (2) Checklists indicating the daily inspections are being performed;
- (3) Checklists indicating the monthly inspections are being performed;
- (4) Checklists indicating the annual inspections are being performed;
- (5) Checklists indicating the continuous ambient monitors are being operated and maintained;
- (6) Summaries including the date, time, equipment identification, and monitoring results for all leaking items;
- (7) Summaries including the date, time, equipment identification, and corrective actions for all isolations, replacements and/or repairs performed, including monitoring results immediately after repairs; and
- (8) Records of the calibration of the portable and continuous monitoring instruments.

(Note: Checklist and summaries may be computerized but shall be verified by signed writing confirming that the required checks were completed.)

Vapor Combustor

11. A. Vents from Fixed-Roof Storage Tanks designated as B1, B2, F2, F3, H1, H2 and Tank 554 and hazardous waste truck and railcar depressurizations shall vent to the Regeneration No. 2 Furnace designated as EPN 104 when it operates and these tank vents and depressurizations shall be directed to the Vapor Combustor designated as EPN 120 up to 1,314 hours per rolling 12 months when EPN 104 is not operable. (12/08)
- B. The MSS emissions (two shutdowns, degassing, and cleaning events per calendar year) from Tanks F2, F3, and T554 and the MSS emissions (two shutdowns, degassing, and cleaning events per calendar year) for the equivalent size Tanks B1 or B2 and MSS emissions (two shutdowns, degassing, and cleaning events per calendar year) for the equivalent size Tanks H1 or H2 shall vent to the Regeneration Unit No. 2 Furnace designated as EPN 104 when it operates and shall be directed to the Vapor Combustor designated as EPN 120 when EPN 104 is not operable. These tank MSS activities are limited to 840 hours per rolling 12 months. (12/08)

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12. Vents from Tanks 48, 49, 53 and 56 and spent tank truck depressurizations shall be vented to the Regeneration No. 2 Furnace designated as EPN 104 when it operates and these tank vents and depressurizations shall be directed to the Vapor Combustor designated as EPN 170 up to 1,314 hours per rolling 12-months when EPN 104 is not operable. A maximum of four tank trucks can be depressurized in one hour to the represented emission controls. (4/07)

Storage Tank Vent 78 and spent railcar depressurizations shall vent to the No. 2 Regeneration Furnaces designated as EPN 104 and can be directed to the caustic scrubber and then routed to the Vapor Combustor designated as EPN 170 when the No. 2 Regeneration Furnace is down up to 1,314 hours per calendar year. The caustic scrubber outlet vent shall be directed to the inlet of EPN 170. (3/06)

13. Each Vapor Combustor designated EPNs 120, 170 and the portable vapor combustor designated as EPN TKINSPMSS2 shall be equipped with a continuously burning pilot system or other automatic ignition system that assures combustor ignition and that provides immediate notification of appropriate supervisory personnel when the ignition system ceases to function properly. (4/07)

Initial Determination of Compliance

14. Sampling ports and platform(s) shall be incorporated into the design of the Vapor Combustor Stack designated as EPN 170 and Regeneration Unit No. 2 Stack designated as EPN 104 according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities." Alternate sampling facility designs may be submitted for approval by the TCEQ Regional Director. (x/12)
15. The holder of this permit shall perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the Vapor Combustor (EPN 170) and Regeneration Unit No. 2 Stack (EPN 104). The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. (x/12) (PSD)
- A. The appropriate TCEQ Regional Office in the region where the source is located shall be contacted as soon as testing is scheduled, but not less than 45 days prior to sampling to schedule a pretest meeting.

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The notice shall include:

- (1) Date for pretest meeting,
- (2) Date sampling will occur,
- (3) Name of firm conducting sampling,
- (4) Type of sampling equipment to be used, and
- (5) Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

DRAFT
A written proposed description of any deviation from sampling procedures specified in permit conditions or the TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Director shall approve or disapprove of any deviation from specified sampling procedures. Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Air, Air Permits Division. Test waivers and alternate/equivalent procedure proposals for New Source Performance Standards testing, which must have the EPA approval, shall be submitted to the TCEQ Regional Director.

- B. Air contaminants emitted from the Vapor Combustor (EPN 170) to be tested for include (but are not limited to) VOC.

Air contaminants emitted from the Regeneration Unit No. 2 Stack (EPN 104) to be tested for include (but are not limited to) CO, H₂SO₄ mist, NO_x, PM and SO₂. These stack testing results shall be used to demonstrate compliance with Special Condition Nos. 1 and 3. Stack testing of EPN 104 shall be completed between 90 days and 180 days after installation of the emission abatement equipment required by Special Condition No. 3. (x/12) (PSD)

- C. Sampling shall occur at such other times as may be required by the Executive Director of the TCEQ. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office. Additional time to comply with the applicable requirements of 40 CFR Part 60 and 40 CFR Part 61 requires the EPA approval, and requests shall be submitted to the TCEQ Regional Director.

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- D. The plant shall operate at maximum production (or loading) rates during stack emission testing. The stack test will be conducted under the combination of the maximum conditions as identified in the MAERT as Vapor Combustor 2-Normal plus Vapor Combustor 2-Standby (maintenance). Primary operating parameters that enable determination of production rate (or loading rate) and combustor operating parameters shall be monitored and recorded during the stack test. These parameters are to be determined at the pretest meeting. If the plant is unable to operate at maximum rates during testing, then future production (or loading) rates may be limited to the rates established during testing. Additional stack testing may be required when higher production rates are achieved. The combustor operating parameters during testing shall be used to set the normal operating conditions until the next stack test is performed.

The sulfuric acid plant shall be sampled while operating at the maximum possible safe production rate (as determined by the permittee) for the H_2SO_4 Regeneration Unit No. 2 at the time of testing for EPN 104. This H_2SO_4 production rate shall be monitored and recorded during the stack test of EPN 104. If the normal production rate of H_2SO_4 from the Regeneration Unit No. 2 exceeds by more than 10 percent the tons per day maintained during sampling of EPN 104, the permit holder must notify, in writing, the appropriate TCEQ Regional Office, and the source may be subject to additional sampling to demonstrate continued compliance. (x/12) (PSD)

- E. Sampling reports shall comply with the attached provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. One copy of the final sampling report shall be distributed as follows within 60 days after sampling is completed. (x/12) (PSD)

The appropriate TCEQ Regional Office; each applicable local air pollution control program; and EPA Region 6 New Source Review in Dallas (EPN 104 only)

- F. A written proposed description of any deviation from sampling procedures specified in permit conditions or the TCEQ or EPA sampling procedures and any written contact as soon as testing is scheduled, but not less than 45 days prior to sampling to schedule a pretest meeting shall be sent to each applicable local air pollution control program with jurisdiction in conjunction with paragraph A of this special condition. Requests for additional time to perform sampling in conjunction with paragraph C of this special condition shall be sent to each applicable local air pollution control program with jurisdiction.

Continuous Demonstration of Compliance

16. The industrial furnace shall not emit non-sulfate particulate matter in excess of 0.02 grain per dry standard cubic feet when corrected for the amount of oxygen in the stack gas in accordance with the formula specified in 40 CFR § 264.343(c). Corrections for the amount of sulfate particulate in the stack gas shall conform to the procedures specified in the TCEQ Laboratory Methods Manual.
17. The following requirements apply to capture systems for EPN 104 emitting SO₂. (x/12)
- A. The permit holder shall conduct a once a month visual, audible, and/or olfactory inspection of the capture system to verify there are no leaking components in the capture system;
 - B. The control device shall not have a bypass.
 - C. If any of the above inspections are not satisfactory, the permit holder shall promptly take necessary corrective action.
18. The minimum liquid flow to the absorber (EPN 104) shall be 200 gallons per minute (gpm). The circulation rate shall be monitored and recorded at least once a day. (x/12) (PSD)

The liquid flow rate shall be recorded at least once an hour.

The flow monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least annually, whichever is more frequent, and shall be accurate to within 2 percent of span or 5 percent of the design value.

The minimum pH on the second stage of the scrubber's scrubbing solution downstream of the Brinks mist filter is 5.0. This pH shall be analyzed and recorded at least once a day.

Each monitoring device shall be cleaned with an automatic cleaning system, or cleaned weekly using hydraulic, chemical, or mechanical cleaning. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least weekly, whichever is more frequent, and shall be accurate to within 0.5 pH unit.

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Quality-assured (or valid) data must be generated when the facility generating emissions are operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in hours) that the facility generating emissions operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgement and the methods used recorded.

19. The holder of this permit shall install, calibrate, maintain and operate a continuous emission monitoring system (CEMS) to measure and record the in-stack concentration of SO₂ and the total gas flow rate from the Regeneration Unit No. 2 Stack (EPN 104) on and after April 1, 2014. (x/12) (PSD)
 - A. The CEMS calibration shall be checked daily and the CEMS shall be zeroed and spanned using cylinder gas at least once a week and corrective action taken when the results differ by greater than ± 5 percent from the tagged cylinder gas value.
 - B. The monitoring data shall be reduced to one-hour average concentrations at least once every month using a minimum of four equally spaced data points from each one-hour period. The individual average concentrations shall be reduced to units of the permit allowable emissions rates in pounds of SO₂ per hour at least once every month.
 - C. All monitoring data and quality assurance data shall be maintained by the source for a period of two years and shall be made readily available to TCEQ personnel, EPA personnel or any local program with jurisdiction upon request. The data from the CEMS may, at the discretion of the TCEQ, EPA personnel or any local program with jurisdiction, be used to determine compliance with the SO₂ emission limits specified in MAERT.
 - D. The CEMS must operate at all times when sulfur bearing compounds (except natural gas) are being fed to the furnace, but need not operate during CEMS breakdown, repairs for calibration checks and zero span adjustments. (x/12)

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- E. The CEMS shall be used to demonstrate compliance with the SO₂ emission limits as found in Special Condition No. 3. The permit holder must meet the quality assurance procedures required by 40 CFR Part 60 Appendix F or any alternate procedures specified in the Alternate Monitoring Plan (Attachment A). (x/12)
- (1) The SO₂ CEMS shall monitor and record the three hour arithmetic average (not weighted by production volume) SO₂ emission rate in units of pounds per ton of one hundred percent acid produced.
 - (2) The SO₂ CEMS shall monitor and record the SO₂ emission rate averaged (arithmetic average, not weighted by production) over all operation hours in each 365 day period in units of pounds per ton of one hundred percent acid produced.
 - (3) Implementation of the monitoring requirements has been defined in the Alternate Monitoring Plan (AMP) for the SO₂ CEMS system.
 - (4) The AMP supersedes the corresponding SO₂ monitoring requirements of NSPS Subpart H.
 - (5) All steps necessary to avoid CEMS breakdowns and minimize CEMS down time must be taken. This shall include, but is not limited to, operating and maintaining the CEMS in accordance with best practices and maintaining an on-site inventory of spare parts or other supplies necessary to make rapid repairs of the equipment.
 - (6) In the event of CEMS downtime lasting longer than twenty-four hours, the permittee shall demonstrate compliance with the emission limits established in Special Condition No. 3 according to the procedures specified in the AMP.

Dated: month day, 2012

Attachment A
Alternative Monitoring Plan for SO₂ Emissions
Rhodia Inc. Houston, TX Unit 2
Single Absorption Sulfuric Acid Regeneration Plant with Scrubber

Justification for Using an Alternative Monitoring Plan (AMP) for SO₂ emissions

The regulations that established the NSPS for sulfuric acid plants are over 30 years old. At the time, the regulatory standard was established as 4 lb of SO₂ emissions per ton of 100 % sulfuric acid produced, and compliance with the standard was to be demonstrated using a calculation similar to Equation 1 below. Regulations required the use of a CEMS to measure SO₂ concentration at the stack (M2), but only required measurement of SO₂ entering the converter by suitable method three times per calendar day. Plants typically rely on the use of a Reich test once per shift to establish the SO₂ concentration entering the converter (M1). While the stack measurement represented a nearly continuous real time indication of the stack concentration, performing a Reich test once per shift for the converter inlet concentration provides little more than a random sample once every eight hours.

The methodology proposed in this AMP will provide a more continuous real-time indication of compliance by using a process analyzer to measure the converter inlet SO₂ concentration. While this analyzer will be nearly identical to the CEMS that is commonly used at the stack, it will not be able to meet all of the standards that are usually applied to a CEMS because of the process conditions and / or physical limitations of an existing facility. For example, it is not feasible to modify the existing ductwork around the analyzer to meet the normal guidelines for straight runs of pipe upstream / downstream of the analyzer. We believe that the disadvantages (places where the analyzer is not quite up to CEMS standards) are far outweighed by the advantages of using a real time instrument, rather than a periodic Reich test, to measure the converter inlet concentration. Rhodia will use best professional judgment to ensure the analyzer located at the converter inlet provides representative data.

Except as noted in this document, the objective of this proposed AMP is to maintain the process analyzer at the converter inlet in a manner that is similar to the stack CEMS, as set forth in 40 CFR Part 60, Appendix B and F.

Definitions

"CEMS" or "Continuous Emission Monitoring System" shall mean equipment that continuously measures and records the concentration and/or emission rate of a pollutant, in the units specified by the emission limit concerned.

"Long-Term Limit" shall mean a sulfur dioxide (SO₂) emission limit for a sulfuric acid plant expressed as pounds per ton of 100% sulfuric acid produced ("lbs/ton"), averaged over all Operating Hours in a rolling 365-day period.

"Malfunction" shall mean, consistent with 40 C.F.R. § 60.2, any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner, but shall not include failures that are caused in part by poor maintenance or careless operation.

"Operating Hours" shall mean periods during which sulfur or sulfur-bearing compounds, excluding conventional fossil fuels such as natural gas or fuel oil, are being fed to the furnace.

"Short-Term Limit" shall mean the SO₂ emission limit for each sulfuric acid plant expressed as pounds per ton of 100% sulfuric acid produced ("lbs/ton"), averaged over each rolling 3-hour period. Except for periods of Startup, Shutdown and Malfunction, the Short-Term Limits established under this Consent Decree shall apply at all times.

"Shutdown" shall mean the cessation of operation of a sulfuric acid plant for any reason. Shutdown begins at the time sulfur or sulfur-bearing feeds, excluding conventional fossil fuels such as natural gas or fuel oil, to the furnace ceases.

"Startup" shall mean the 24-hour period at any sulfuric acid plant beginning when the feed of sulfur or sulfur-bearing materials, excluding conventional fossil fuels such as natural gas or fuel oil, to the furnace commences after a main gas blower shutdown.

Part 60.84 Emissions Monitoring.

Compliance with the Long-Term Limit and Short-Term Limit defined by the Consent Decree will be demonstrated using SO₂ analyzers at the converter inlet and exit stack using the following equation. Refer to additional discussion below the equation for specific details related to data input and calculation.

Equation 1

$$Xe = (M1 - M2) / (M1 - 1.5 \times M1 \times M2)$$

$$E = (K / Xe) - K$$

Where:

X_e = fractional conversion efficiency

M_1 = fractional concentration of SO_2 entering the converter

M_2 = fractional concentration of SO_2 at the stack

E = SO_2 emission rate in lb / ton of 100 % acid produced

K = $1306 = (2000 \text{ lb / ton}) \times (64 \text{ lb / lbmol } SO_2) / (98 \text{ lb / lbmol } H_2SO_4)$

Short-Term Limit

The following procedure and calculation will be performed once every five minutes during all Operating Hours, except periods of Startup, Shutdown or Malfunction, to demonstrate compliance with the Short-Term Limit for SO_2 .

At any given time the system will maintain an array consisting of the 36 most recent samples of the SO_2 concentrations at the converter inlet and at the exit stack.

Once every five minutes, the system will sample the latest SO_2 concentrations, add the recent readings to the array and delete the oldest readings. If the unit is not operating then the array of data will not change.

$M_{13hravg}$ will then be calculated as the arithmetic average of the 36 most recent data samples for the fractional concentration of SO_2 entering the converter ($M_{13hravg}$).

$M_{23hravg}$ will then be calculated as the arithmetic average of the 36 most recent data samples for the fractional concentration of SO_2 at the stack ($M_{23hravg}$).

- The rolling 3 hour average SO_2 emissions (E_{3hravg}) will then be calculated per Equation 2.

Equation 2 (rolling 3 hour average SO_2 emissions)

$$X_{e3hravg} = (M_{13hravg} - M_{23hravg}) / (M_{13hravg} - 1.5 \times M_{13hravg} \times M_{23hravg})$$

$$E_{3hravg} = (K / X_{e3hravg}) - K$$

- The production unit will be deemed to be operating in compliance with the Short Term Limit if E_{3hravg} does not exceed 3.0 lb of SO_2 per ton of 100% sulfuric acid produced during all Operating Hours except periods of Startup, Shutdown or Malfunction.

During routine calibration checks and adjustments of the SO_2 monitors, the SO_2 measurement will be "frozen" at its pre-calibration level. Refer to System Maintenance and Malfunction for guidance during CEMS malfunctions, breakdowns, and repairs.

Long-Term Limit

The following method will be used to calculate the daily average lb of SO₂ per ton of 100% sulfuric acid, and the number of Operating Hours for the calendar day.

- Once every five minutes during all Operating Hours, the SO₂ concentrations (converter inlet and exit stack) will be sampled and this time will be counted as five operating minutes. If the unit is not operating, then the SO₂ concentrations will not be sampled.
 - The daily average will be calculated as follows for each calendar day:
 - o M1_{daily avg} will be calculated as the arithmetic average of the sample population for the fractional concentration of SO₂ entering the converter.
 - o M2_{daily avg} will be calculated as the arithmetic average of the sample population for the fractional concentration of SO₂ at the stack
 - o E_(daily avg) will then be calculated using Equation 3.
- Equation 3 (daily average SO₂ emissions)
- $$X_{e \text{ daily avg}} = (M1_{\text{daily avg}} - M2_{\text{daily avg}}) / (M1_{\text{daily avg}} - 1.5 \times M1_{\text{daily avg}} \times M2_{\text{daily avg}})$$
- $$E_{\text{daily avg}} = (K / X_{e \text{ daily avg}}) - K$$
- o The number of operating minutes for the day will be summed (T_{day}).
 - o E_{dayavg} and T_{day} will be used to calculate a 365-day rolling average of lb/ton. The daily averages will be weighted by the number of operating minutes per day, as per Equation 4.

Once the system has been in operation for 365 days, compliance with the Long Term Limit (365-day rolling average) SO₂ emission rate will be calculated using Equation 4.

Equation 4

$$E_{365 \text{ avg}} = \frac{\sum [E_{\text{dayavg}} * T_{\text{day}}]}{\sum T_{\text{day}}}$$

The production unit will be deemed to be operating in compliance with the Long-Term Limit if E_{365avg} does not exceed 1.8 lb of SO₂ per ton of 100% sulfuric acid produced during all Operating Hours

During routine calibration checks and adjustments of the SO₂ monitors, the SO₂ measurement will be "frozen" at its pre-calibration level. Refer to System Maintenance and Malfunction for guidance during CEMS malfunction, breakdowns, and repairs:

Pt. 60.84 Emissions Monitoring Pt. 60, App. B, Spec. 2, Section 6.0 (Stack and Converter Inlet Analyzers)

Rhodia proposes to use the following stack analyzer specifications to satisfy the requirements of Pt. 60.84 and Pt. 60, App. B, Spec. 2, Section 6.0. The stack analyzer span must be capable of accommodating elevated emissions during startup. Specifications for the analyzer located at the converter inlet are based on Rhodia's experience with process analyzers at these locations.

An equivalent analyzer may be substituted for any reason.

Location	Manufacturer	Model Number	Range
Stack	Ametek Photometric Analyzer (or equivalent)	920 (or equivalent)	Dual range: Normal: 0 – 500 ppm SO ₂ SSM: 0 – 3,600 ppm SO ₂
Converter Inlet	Ametek Photometric Analyzer (or equivalent)	920 or IPS-4 (or equivalent)	Single range: 0 – 15 % SO ₂

Pt. 60, App. B, Spec. 2, Section 1.0 (Stack and Converter Inlet Analyzers)

Initial compliance certification required only if the analyzer is replaced or if system modifications require one to be performed. Additional detail and exceptions noted below under System Modifications below.

Pt. 60, App. B, Spec. 2, Section 8.0 (Converter Inlet Analyzer)

Rhodia will select the optimum location to obtain representative SO₂ readings from this location. Turbulence near the blower exit and elevated temperature at the converter inlet may require an analyzer measurement location that differs from the requirements of this section (e.g. pollutant stratification). A pollutant stratification test is not warranted for this application because (a) process conditions make it extremely unlikely that stratification could occur, and (b) the samples obtained under this monitoring plan are the same as would be obtained under the NSPS, except

that the instrument will typically take 288 samples per day rather than the 3 required by the NSPS. Therefore, no new stratification risk is introduced by this method, but the instrument will typically take about 100 times as many samples.

Pt. 60, App. B, Spec. 2, Section 16.0 (Converter Inlet Analyzer)

Rhodia will use the Alternative Relative Accuracy Procedure provided in Section 16.2.1 (i.e. conduct a cylinder gas audit).

Pt. 60, App. F, Spec. 2, Section 5.0 (Converter Inlet Analyzer)

Rhodia will use quarterly cylinder gas audits (i.e. four per year) to satisfy the requirements of this section.

System Maintenance and Malfunction

Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the plant shall conduct monitoring in continuous operation during all Operating Hours as defined above.

In the event of a CEMS malfunction of greater than 24 hours:

- Exit stack gas will be sampled and analyzed at least once per hour, during all Operating Hours. Sampling will be conducted by Reich test or other method (e.g. portable analyzer).
- Converter inlet gas will either be sampled, or estimated using engineering judgment, at least once every four hours during all Operating Hours.
- Compliance with the Short-Term Limit and Long-Term Limit shall be verified by using these data and Equations 2, 3, and 4 with the following exceptions. If the stack CEMS is out of service, the most recent hourly reading will be substituted for the 12 five-minute readings that would otherwise be taken if the system was operating normally. Similarly, if the converter inlet SO₂ analyzer is out of service, the most recent four-hour reading will be substituted for the 48 five-minute readings that would otherwise be taken if the system was operating normally.

In the event of an analyzer malfunction, a like-kind replacement may be used while repairs are being made. A cylinder gas audit (CGA) must be performed on the replacement analyzer as soon as is practicable after it is placed in service. The daily calibration drift requirement would also apply to the replacement analyzer.

System Modifications

Significant replacement, modification, or change in certified CEMS equipment may require a complete recertification. If a recertification is required, it will be conducted within 90 days. Examples include:

- Change in location or orientation of the sampling probe or site
- Complete replacement of an existing continuous emission monitoring system.

When replacing components that can alter the physical characteristics or conditioning of the sample in the field, a CGA is required. The following activities will require a CGA to be performed before returning the analyzer to service.

- Replacement of the analyzer
- Detector replacement
- Replacement of equipment associated with the detector

The following activities are not expected to trigger a CGA. However, it is recommended that a Calibration Drift check be performed before returning to service.

- Filter replacement
- Data Recorder Repairs
- Tubing replacement

General guidance: When replacing components or devices that do not affect the physical characteristics or handling of the gas in the field such as data recorders, a CGA is not required. A calibration drift check normally should be conducted. If the repaired component affects the transport of the gas to the analyzer, such as replacing tubing, a leak check should be conducted.

Alternative Monitoring System

The monitoring system proposed in this Alternative Monitoring Plan is expected to be a significant improvement over the monitoring requirements contained in the NSPS for sulfuric acid plants. However, the real-time calculation of SO₂ emissions is dependent upon the use of an SO₂ analyzer in the inlet duct to the converter, and the maintenance of that analyzer to approximately the same performance standards normally applied to the stack SO₂ CEMS. This is an unproven application of this technology, and there is some risk that the converter inlet SO₂

analyzer will not be able to perform as required despite the best efforts of Rhodia and the instrument manufacturer.

If Rhodia and the instrument manufacturer are unable to make the system operate to the indicated standards because the converter inlet SO₂ analyzer is unreliable and / or inaccurate in this application, then Rhodia will promptly notify EPA Region 6, and TCEQ of its determination and proceed as follows:

- Rhodia will immediately begin meeting its SO₂ emissions monitoring requirements in accordance with 40 CFR Part 60, Subpart H, except that the SO₂ concentration at the converter inlet will be analyzed six times per day rather than the three times per day specified in the regulations.
- Rhodia will provide whatever information is requested by EPA regarding the determination that the converter inlet SO₂ analyzer can not meet the necessary performance standards.
- Rhodia will work with EPA to determine whether real time measurement of SO₂ emissions (in lbs / ton of acid) can be readily accomplished through other means without the use of an SO₂ analyzer at the converter inlet.

Dated month day, 2012

APPROVED CHEMICAL LIST FOR HAZARDOUS WASTE OPERATIONS

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Acetaldehyde
Acetic Acid
Acetic Anyhdride
Acetone
Acetone Cyanohydrin
Acetonitrile
Acetophenone
2-acetylaminofluorene
Acetyl Chloride
Acetylsalicylic acid
Neo Acid Anhydrides
Acrolein*
Acrylamide (solid)
Acrylonitrile*
Acrylic Acid
Adipic acid
Adiponitrile
Aldrin
Alicarb
Aliphatic Carboxylic Acid
Aliphatic Hydrocarbons
Alkenyl Caroxylate
Allyl Alcohol
Alpha Methylstyrene
Alpha Naphtylamine
Alpha Naphthylthiourea
2-(2-Aminoethoxy)Ethanol
4-aminophenol
Aminoethyl Ethanolamine
tris(hydroxymethyl)aminomethane
Amitrole (solid)
Ammonia
Ammonium Hydroxide
Ammonium Nitrate*
Ammonium Polysulfide
Ammonium Procrate, dry
t-Amyl Hydroperoxide
Aniline*
Anthracene*
Anthroquinone
Antimony*
Aromatic Naphtha
Arsenic*
Arsine*

Ash
Atrazine*
Auramine
Azeo Oil

Barium*
Barium Sulfate
Bendocarb
Benz(a)anthracene
Benz(a)pyrene*
Benz(c)acridine
Benzaldehyde
Benzamide,3,5-dichloro-N-(1,1-dimethyl-2-propynyl)
Benzyl mercaptan
Benzene*
Benzene,1,1-(2,2-dichloroethylidene)bis[4-chloro-]
Benzenediamine
Benzeneethanamine,alpha,alpha-dimethyl-
Benzene Hexchloride
Benzene Sulfonyl Chloride
Benzidine (solid)
Benzonitrile
Benzo (RST) pentaphene
Benzo (a) pyrene
Benzo (a) phenanthrene
Benzotriazobenzotriazole
Benzoic Acid
p-Benzoquinone*
2-(2-hydroxy-3,5 di-(tert)amylphenol)
benzotirazole
Benzotrichloride
Benzoyl Chloride
Benzyl Chloride*
Beryllium
Biodiesel
Biphenyl*
Bipyridyl
Bis(2-chloroethoxy)methane
Bishexamethylenediamine
Bis(methylthio)methane
Boron
Bromoacetone, liquid

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Bromoform (tribromomethane)
Bromomethane (methyl bromide)
Brucine (solid)
Butadiene polymer
Butadiene tar
n-Butyl Acetate
Butyraldehyde*
Butyl Ether
n-Butyl Formate
n-Butyl Propionate
1,3 Butadiene
n-Butane
1,4 Butanediol
Butanol
2-Butanol
n-butanol
t-butanol
1-Butene
cis-3 Butene
2-methyl-1-butene
n-butyl acetate
Butyl Acrylate
sec-butyl alcohol
Butylcellosolve
t-Butyl Hydroperoxide*
n-Butylmercaptan
1,3-Butylene Glycol
2-butyne-1,4-diol (BYD)
1,4-butyndiol
Butyric Acid*
2-methyl butyric acid

C-4
Cacodylic Acid
Camphechlor
Carbaryl (solid)
Carbon Bisulfide
Carbon Disulfide*
Carbon Tetrachloride
Castor Oil
Catechol
Chloral, anhydrous, inhibited
Chlordane

Chlorinated Polyisobutylene
Chloroacetaldehyde
Chloroaniline-p
Chlorobenzene
1,2,4,5-tetrachlorobenzene
Chlorobenzilate
1-Chlorobutane
2-chloroethyl vinyl ether
Chloroform
Bis (2-chloro-1-methylethyl) ether
Chloromethane
(Chloromethyl) ether, bis
Chlormethyl methyl ether
Chloronaphazine
2-chloronaphthalene
o-Chlorophenol
2,6-dichlorophenol
Chromium*
Chrysene*
Coal tar
Creosote
Cresol
m-cresol
4-chloro-m-cresol
p-cresol
Crotonaldehyde
Cumene Hydroperoxide
di-tert-butyl-para-Cresol
Cumene
Cumene Hydroperoxide
p-Cumyl Phenol
Cyanogen Bromide
Cyanogen Chloride with less than 0.9% water
Cyanogen Gas
1,3,6-tricyanohexane
Cyclohexane
Cyclohexanone
Cyclooctadiene
Cyclophosphamide
Copper*
Creosote*
Crotonaldehyde*
Cyclohexyl Amine*

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Cyclopentadiene	Diglyme
Daunomycin	2,3 dihydrofuran
DDT	Dihydrosafrole
Diacetone Alcohol	Diisobutylene
Dialkyl Disulfide Oil	Dimethoate
Dibenz (A,H) anthracene	Dimethoxybenzidine-3,3
Dibromomethane	Dimethylamine
Dibromomethane-1,2	p-dimethylaminoazobenzene
Dibutylphthalate	Dimethylaminoethoxyethanol
Dicamba	Dimethylbenz(a)-anthracene-7,12
o-Dichlorobenzene	Dimethylbenzene
m-Dichlorobenzene	Dimethylbenzidine-3,3
p-Dichlorobenzene (solid)	(1,3-dimethylbutyl)-N-phenyl
Dichlorobenzidine-3,3 (solid)	Dimethylcarbaryl Chloride
Dichlorobutene	Dimethyl Disulfide
Dichloro-1,4, butene-2	Dimethylethanolamine*
1,2-Dichloroethane	Dimethylformamide
trans-1,2-dichloroethene	Dimethylhydrazine, unsymmetrical
Dichloroethyl ether	Dimethylmethylaminoethoxy ethaneamine
Dichlorodifluoromethane	Dimethylphenol -2,4
Dichloromethane	(1,4-dimethylphenyl)-N-phenyl
Dichlorophenol-2,4	Dimethyl Phthalate
2,4 Dichlorophenoxy Acetic Acid	Dimethyl Siloxane
Dichloropropylene-1,3	Dimethyl Sulfate
Dicyanoethylamine	Dimethyl Sulfide
Dicyclopentadiene	Dimethyl Sulfoxide
Dieldrin	Dimethyl Disulfide*
Diepoxybutane	Dimethyl Formamide (DMF)
Diethanolamine	1,2 Dimethoxybenzene
Diethylaminoacetone	Dimethoxyethane
Diethyl Sulfide	Dimethyl Ether
Diesel Fuel	Dimethylaminopropylamine DMAPA
Di(2-ethylhexyl)phthalate	Dimorphoxy Amino Glycol
Diethylarsine	4,6 Dinitro-o-cresol*
Diethyl Ether	Dinitrocyclohexylphenol
Diethyl Ketone	Dinitrotoluene-2,4
Diethyl Phthalate	Di-n-octyl Phthalate
Diethylstilbestrol	Dinoseb
Diethylene Glycol	Di-N-Propylamine
Diethylene Glycol Dimethyl Ether	Dioxane
Diethylene Glycol Monomethyl Ether	Diphenyl Hydrazine-1,2
Diethylenetriamine	Dipropylamine
	Dipropylene Glycol Methyl Ether

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Disulfoton
Di-t-butyl Peroxide
Dithiobiuret
Dithiobiuret
Diruon
Dodecane
Dodecylbenzene
Dodecylbenzene alkylates
Dodecyl Mercaptan*
tert-dodecylmercaptan

Endosulfan
Endrin
Epichlorohydrin*
Epinephrine
1,2 ethanedithiol
Ethane, 1,1,1,2-tetrachloro
Ethanimidothioic acid, N-
[(methylamino)carbonyl[oxy]-methyl ester]
Ethanol
n-nitrosodiethanolamine
Ethoxy Ethanol
Ethoxy Triglycol
Ethyl Acetate
Ethyl acrylate
n-nitrosodiethylamine
Ethylbenzene
Ethyl Carbamate
Ethyl Lactate
Ethyl Mercaptan
Ethyl Methacrylate
Ethyl Methanesulfonate
Ethyl Methyl Ketone
Ethyl Parathion (solid)
Ethyl trimethoxysilane
Ethylene
Ethylene Bromide
Ethylene Dichloride
Ethylene Imine, inhibited
Ethylene Oxide*
Ethylene Thiourea (solid)
Ethylidene Dichloride
2-Ethylhexaldehyde

Ethyl Lactate
Ethylene Almine, inhibited
Ethylene Diamine
Ethylene Glycol
Ethylene Oxide
2 Ethyl-1-Hexanol
2-Ethylhexanoic Acid
Ethyl mercaptan*
Ethylidene norbornene
Ethyl Propyl Acrolein
Ethylsuccinonitrile
Etoposide

Facet 75 DF Herbicide
Famphur
Fatty Acids
Fludioxonil
Flumaric Acid
Fluoroacetamide
Fluoranthene
Fluorosulfonic Acid
Fluorotrichloromethane
Fluorothene
Formaldehyde*
Formic Acid
No. 2 Fuel Oil
Furan
Furfural*

Gasoline
Gasoline Jet Fuel
Glutaric acid
2-methylglutaronitrile
Glycidaldehyde
Glycol Acetate
Glycol Diacetate
Grease
Guaiacol
Guanidine, N-methyl-N'-nitro-N-nitroso-
HBM (2-hydroxisobutyric acid methyl ester)
Heptachlor (solid)
Heptane
Heptanol

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3-Heptanone	Isopropyl Formate
Hexachlorobenzene	Isopropyl Mercaptan
Hexachloro-1,3-butadiene*	Isosafrole
Hexachloroethane	Isozaflutole
Hexachlorocyclopentadiene	
Hexachlorophene	Kerosene
Hexachloroprene (solid)	Ketone
Hexane	Keto/enol
1,6 hexamethylene diisocyanate*	
Hexamethylene-1,6-diisocyanate	Lasiocarpine
Hexene	Lead Acetate
Hydraulic Oil*	Lindane*
Hydrazine	Lube Oils
Hydrazine, 1,2-diethyl-	
1,2-dimethylhydrazine	Magnesium Chloride
Hydrazine Hydrate	Malathion
Hydrochloric Acid, liquid	Maleic Anhydride*
Hydrocyanic Acid, liquefied	Malononitrile
Hydrogen Chloride*	Manganese*
Hydrogen Cyanide	Metenoxam
Hydrogen Silesquioxane	Melphalan
Hydrogen Sulfide	Mercury
Hydroquinone	Methacrylonitrile
Hydroquinone Methyl Ether	Methanethiol*
2-hydroxyisobutyric acid methyl ether (HBM)	Methaprylene
Hydroxylamine	Methomyl Intermediate (MHTA)
	Methoxychlor (solid)
	Methoxydihydropyran, liquid
Indene*	n-(2-Methoxy-;-Methylethyl)-2,4-dimethyl-
Indeno (1,2,3-CD) Pyrene	2-amino-1-methoxypropane
Iron Sulfate	n-methylacetamide
Isobutanol	Methyl-3-13-(2H-benzotrizole-2-YL)-5-(tert)-
Isobutyl Acetate	butyl-4 hydroxy phenyl) propionate
Isobutyraldehyde	Methyl Chloride
Isodecyl Alcohol	Methyl Chlorocarbonate
Isooctane	Methyl Chloroform
Isodrin	Methyl Cyclohexane
Isopar E	Methyl Ethyl Ketone Peroxide
Isopar L	Methyl Glutanoitrile
Isopentane	2-Methylglutanronitrile
Isoprene	1-Methoxy-2 Propanol
Isopropanol	2-Methoxy-1 Propanol
Isopropyl Acetate	Methyl Acetate
	Methyl Acrylate*

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Methyl Alcohol
 3-methylcholanthrene
 Methyl Chlorocarbonate
 Methylcholanthrene-3
 n,n-bis-methylethyl
 Methyl Ethyl Ketone
 Methyl Ethyl Morpholine
 Methyl Formate
 3-methylhexane
 Methyl Hydrazine
 Methyl Iodide
 Methyl Isobutyl Ketone
 Methyl Isocyanate
 1-Methyl-2-Pyrrolidinone NMP
 Methyl Mercaptan
 Methylmercaptopropionaldehyde
 Methyl Methacrylate
 n-methyl morpholine
 Methyl naphthalene*
 Methyl Parathion
 4-methyl-2-pentanone
 2-(3,5-bis(methylphenylethyl)-2-hydroxyphenyl
 Methyl Propyl Ketone
 n-methyl pyrillidone
 Methyl Tert-Butyl Ether
 tetramethylthiuram disulfide
 n-nitroso-n-methylurethane
 Methylal
 Methylthiouracil
 Methylcyclohexanol
 Methylene-bis-ortho-chloroaniline
 Methylene Chloride
 Methylpyridine-2
 Methyl vinyl bis
 (N-methylacetamindes) silane
 Mitomycin c
 Molybdenum
 Monochloroethylene
 Monoethanolamine*
 Monoisopropylamine
 Monomethyl ether hydroquinone
 Monopropylene Glycol

Morpholine
 Muscimol

 Naphtha
 Naphthalene
 1,4-naphthoquinone
 Naphthylamine-beta (solid)
 Nitric Acid
 Nitric Oxide
 Nickel*
 Nitroaniline-p (solid)
 Nitrobenzene*
 Nitrodium-n-butylamine-N
 Nitroglycerin (glyceryl)
 Nitropropene-2
 Nitrophenol*
 Nitrophenol-4 (solid)
 2,4-dinitrophenol
 2-nitropropane
 Nitrosopipindine-n
 Nitrosuliethylamine-n
 Nitro-o-toluidine-5
 Nitroso-N-ethylurea-N
 Nitroso-N-methylurea-N
 N-nitrosodi-N-propylamine
 m-Nitrotoluene
 2,6-dinitrotoluene
 Nonanal
 Nonene
 tert-nonyl mercaptan
 Novalar resins

 Octane
 Octanol
 n-Octyl Mercaptan*
 Orthovanillin

 Paraldehyde
 Pelargonic Acid*
 Pentachlorobenzene
 Pentachloroethane
 n-pentane
 Pentanol
 n-Pentanoic Acid*

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Pentenitrile
3-pentenitrile
Perchloroethylene
Petroleum Distillates
Petroleum Distillates, Hydraulic Fluid
Petroleum Oil
Phenacetin
Phenanthrene*
Phenol
2,4 bis(alpha, alpha-dimethyl benzyl)
phenol)
Phenothiazine
4-bromophenyl phenyl ether
Phenyl mercaptan
Phosgene*
Phosphine*
Phosphorus Pentasulfide
Phthalic anhydride
Pinene-alpha
Pinene-beta
Piperylene
Poast herbicide
Polyester Glycol
Polyethylbenzene
Polyethylene
Polyethylene glycol dimethyl ether
Polyisobutyleneamine
Polyoxyalkyleneamine
Polypropylene*
Polystyrene
Potassium Acetate
Potassium Carbonate
Process Oil
Promamide
Propane
2-amino-1,3-propanediol
2-amino-2-ethyl-1,3-propanediol
2-amino-2-methyl-1,3-propanediol
Propane Sultone
Propanil
Propanol
2-amino-2-methyl-propanol
Propargyl Alcohol*

Propionaldehyde*
Propionic Acid
Propionitrile
Propionitrile, 3-chloro
Propyl Acetate
Propylamine
Propyl Heptenal
n-nitrosodi-n-propylamine
Propylene
Propylene Dichloride
Propylene Glycol*
Propylene Glycol Acetate
Propylene Glycol Methyl Ether
Propylene Glycol Monoethyl Ether
Propylene Glycol Monoethyl Ether Acetate
Propyleneimine, inhibited
n-Propylmercaptan*
Propxur
Pyridine*
Pyridine, 4-amino-
n-nitrosopyrrolidine
n-vinyl-2-pyrrolidinone
Quaternarium Salts
Quintozene (solid)
Reactive Sulfides
Red Oil
Reserpine
Resorcinol
Rhodium*
Safrole
Sassafras Oil
Selenium*
Soap
Sodium Hydroxide*
Sodium Hypochlorite
Sodium Methoxide
Sodium Methylmeraptide
Sodium Nitrate
Sodium Sulfate*
Sodium Sulfide
Sodium Thiosulfate*

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Sosafrole-1
Succinic acid
Succionitrile
Sulfolane
Sulfur*
Styrene
Sulfate Turpentine
Sulfolane
Sulfurized isobutylene

Taxol
Terbufos
Terphenyl
Tert Amyl Alcohol
Tert Butyl Alcohol
Di-tert nonyl polysulfide (TNPS)
Tertiary amine
Tetrachloroethane
Tetrachloroethylene
Tetraethylene Glycol
Tetrahydrofuran
Tetrahydrothiophene
Thiamethoxam
Thioacetamide (solid)
Thiofanox
1-acetyl-2-thiourea
Thiourea (2-chlorophenyl)-
TDI Polymers*
Thiosemicarbazide (solid)
Titanium tetrachloride
Toluene
Toluene Diamine*
o-toluenediamine
2,4-toluene diisocyanate
2,6-toluene diisocyanate
o-toluic acid
Toluidine
Toluidine hydrochloride-o
4-chloro-o-toluidine hydrochloride
Toxaphene*
Triallyl Amine*
Tributylamine
Tributyl phosphate

1,2,4-Trichlorobenzene
1,1,1-Trichloroethane
1,1,2-Trichloroethane
Trichloroethene
Trichloroethylene
Trichlorofluoromethane
Tridecane
Triethanolamine*
Triethylamine*
Triethylene Glycol
Trifluralin
Trimellitic Anhydride
Trimethylbenzene
Tripolyamine
Tri-n-propylamine*
2,4,6-Trinitrophenol*
Trypan blue

Undecane
Uracil Mustard

n-Valeraldehyde
4-keto-1-valeric acid
Vanillin
Vinyl Acetate
Vinyl Acetate Polymer
Vinyl Chloride
4-Vinyl cyclohexene-1*
Vinyl Methyl Ether
Vinylidene
Vinylidene Chloride
Vinyltrimethoxysilane

Warfarin*

p-Xylene
Xylene
Xylidine (p-dimethylaminoazobenzene)

* These compounds are subject to the emission rate limits of the July 2004 dispersion modeling report.

Dated: month day, 2012



1934

1. The first part of the report
describes the general situation
of the country and the
state of the economy.
It also mentions the
political situation and
the state of the
army.

2. The second part of the report
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economy and the
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EMISSION SOURCES – MAXIMUM ALLOWABLE EMISSION RATES

Permit Number 4802/PSDTX1260

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
104	Regeneration Unit No. 2 Stack (8)	Cl ₂	5.70	25.00
		CO	0.84	0.18
		H ₂ SO ₄ (10)	6.06	22.67
		HCl	0.28	1.23
		NO _x	37.20	162.90
		PM	4.01	12.47
		PM ₁₀	4.01	12.47
		PM _{2.5}	4.01	12.47
		SO ₂	1250.00	5475.00
		VOC	0.01	0.01
104	Regeneration Unit No. 2 Stack (9)	Cl ₂	5.70	25.00
		CO	0.01	0.05
		H ₂ SO ₄ (10)	7.19	20.99
		HCl	0.16	0.70
		NO _x	37.20	61.95
		PM	4.01	12.47
		PM ₁₀	4.01	12.47
		PM _{2.5}	4.01	12.47
		SO ₂	143.75	377.78
		VOC	0.01	0.01
120	Vapor Combustor Standby Operation for Backup	CO	1.51	3.33
		NO _x	1.80	3.96
		PM ₁₀	0.14	0.30
		SO ₂	0.01	0.02
		VOC	0.10	0.22
120	Vapor Combustor (6) (Startup, Shutdown, and Maintenance 1,314 hours per rolling 12-months)	Cl ₂	0.14	0.09
		CO	0.40	0.27
		HCl	0.06	0.04
		NO _x	0.48	0.32
		PM ₁₀	0.04	0.02
		SO ₂	0.01	0.01
		VOC	22.22	3.41
128	Regenerator No. 2 Preheater	CO	2.07	1.03

Emission Sources -- Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
	(1,000 hours per rolling 12-months)	NO _x	2.46	1.23
		PM ₁₀	0.19	0.10
		SO ₂	0.02	0.01
		VOC	0.14	0.07
170	Vapor Combustor 2 Normal Operation	CO	4.28	0.30
		NO _x	2.15	0.15
		SO ₂	0.01	0.01
		VOC	0.08	0.01
170	Vapor Combustor 2 (6) (Furnace Startup, Shutdown, and Maintenance 1,314 hours per rolling 12-months)	Cl ₂	0.40	0.03
		CO	15.30	4.85
		HCl	2.07	0.13
		NO _x	1.78	0.57
		SO ₂	2.02	0.13
		VOC	12.90	0.86
170	Vapor Combustor 2 (6) (Storage Tanks 48, 49, 53, and 56 Planned Inspection Purge Control Option One)	CO	10.81	1.48
		NO _x	1.26	0.17
		SO ₂	0.02	0.01
		VOC	0.05	0.01
GATSCNR2	Catalyst Screening for Regeneration Unit No. 2 Converter (6)	PM	0.01	0.01
		PM ₁₀	0.01	0.01
		PM _{2.5}	0.01	0.01
MSS-HAZTK1	Hazardous Waste Tanks (F2, F3) and T554, Planned MSS Purge (6)	VOC	0.02	0.01
MSS-HAZTK2	Hazardous Waste Tanks (B1, B2, H1, and H2) Planned MSS Purge (6)	VOC	0.01	0.01
TKINSPMSS1	Tank 78 Planned Inspection Purge (6)	CO	3.04	0.75
		C ₂ H ₄	0.01	0.01
		NO _x	1.12	0.35
		SO ₂	0.08	0.09
		VOC (7)	0.05	0.06
TKINSPMSS2	Tanks 48, 49, 53, and 56 Planned Inspection Purge (6)	CO	3.04	0.40
		C ₂ H ₄	0.01	0.01
		NO _x	1.12	0.19
		SO ₂	0.08	0.01
		VOC (7)	0.05	0.01
FE2	Process Fugitives (5)	SO ₂	0.05	0.20
FE3	Process Fugitives (5)	SO ₂	0.01	0.03
FE-12	Fugitives from HW Equipment (5)	VOC	0.04	0.19

Emission Sources – Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
FE-13	Fugitives from HW Equipment (5)	VOC	0.02	0.10
FE-14	Fugitives from HW Equipment (5)	VOC	0.01	0.01
FUG-SA1	Spent Acid Process Fugitives (5)	H ₂ SO ₄	0.41	1.79
		SO ₂	0.12	0.37
		VOC	0.09	0.35
FUG-SA2	Spent Acid Process Fugitives (5)	H ₂ SO ₄	0.07	0.31
		SO ₂	0.03	0.08
		VOC	0.02	0.07
FUG-SA3	Spent Acid Process Fugitives (5)	H ₂ SO ₄	0.03	0.11
		SO ₂	0.06	0.18
		VOC	0.03	0.08
FUG-SA4	Spent Acid Process Fugitives (5)	H ₂ SO ₄	0.30	1.34
		SO ₂	0.13	0.38
		VOC	0.08	0.30

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) C₂H₄ - ethylene
CO - carbon monoxide
Cl₂ - chlorine
H₂SO₄ - sulfuric acid
HCl - hydrogen chloride
NO_x - total oxides of nitrogen
PM - particulate matter greater than 10 microns in diameter
PM₁₀ - particulate matter (PM) equal to or less than 10 microns in diameter.
PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter
SO₂ - sulfur dioxide
VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
- (4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
- (6) Planned startup, shutdown, and maintenance emissions
- (7) Ethylene emissions are not included in the VOC emission total.
- (8) Pre emission control
- (9) Post emission control effective on and after April 1, 2014
- (10) PSDTX1260 pollutant

Emission Sources -- Maximum Allowable Emission Rates

Emission rates are based on and the facilities are limited by the following maximum operating schedule:

Hrs/day 24 Days/week 7 Weeks/year 52

Date: month day, 2012

DRAFT

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**AIR, PESTICIDES, AND TOXICS
6TH FLOOR RECORDS CENTER
INFILING / NEW FILE FORM**

New File ☐

OR

Infiling



Choose from the file types below:

AIR FACILITY:

- (☐) AR - Acid Rain
(☐) CB - Confidential Business
(☐) CO - Compliance
(☐) EN - **Enforcement
(☐) GE - General
(☒) PE - Permit
(☐) RA - Regulatory Applicability
(☐) Other _____

TSCA:

- (☐) AH - Asbestos Hazard Emergency
Response Act
(☐) AS or AW - Asbestos or Asbestos
Worker Protection
(☐) CB - Confidential
(☐) FI - Site Specific
(☐) FO - Non Site Specific
(☐) IM - **Section 5 & 8
(☐) LB - **Lead
(☐) PC - **PCB

** Extension of file type (if needed): (☐) ES - Enforcement Sensitive
(☐) DO - Docket Number

EPCRA/SARA (☐)

FIFRA (☐)

EPA Registry I.D.

Current FRS Number:
(Found in EnviroFacts)

110000460901

Facility Name & Physical Address:

Rhodia, Inc.

8615 Manchester St.

Houston, Tx. 770122142

Remarks:

Requestor's Name & Phone Number:

Les Koval

X6733

Program Management Files:

A current listing of these file types and their numeric codes are located in a blue binder on the top shelf of the "APT" file cabinet in the 9th Floor Records Center.

AIRS - Aerometric Information Retrieval System

ATO - Air Toxics

EMR - Emergency Response

ENF - Enforcement -

ENF 5-5-1 requires Month and Fiscal Year accompany file code.

ENF 5-6-5 requires Fiscal Year accompany file code.

EXR - External Relations

GEO - Geographical Summary Data

GRA - Grants Administration

The majority of this section requires the Fiscal Year accompany file code.

Project Officer Grants require the Grant number and Fiscal Year accompany file code.

LAB - Laboratory Support

LBP - Lead Based Paint

LBP 12-3 requires the facility name in which document refers to be either highlighted or circled on the top page.

LEL - Legal and Legislative

MON - Monitoring NES - National Emission Standards

NSP - New Source Performance

NSR - New Source Review

OPP - Operating Permits Program

PEA - Permits Administration Program

PES - Pesticides

PLA - Planning

PUA - Public Affairs

RAD - Radiation

RCR - Resource Conservation and Recovery Act - Regulatory Development

RDE - Research and Development

REG - Registration

SIP - State Implementation Plan

SUP - Superfund

TITL - Title III

TSC - Toxic Substance Control

TSC 1-1-4 requires the facility name in which document refers to be either highlighted or circled on the top page.

TSU - Technical Support

VRP - Voluntary Reduction Program

Part 14 of Rhodia

~~Part 14~~

RHODIA INC.

**Houston Plant
Houston, Texas**

TCEQ Permit Amendment Application

June 2011

Trinity 
Consultants

trinityconsultants.com

RECEIVED

11 JUN 10 PM 3:04

BPD-S SECTION
EPA DALLAS, TX



*Eco Services Enterprise
Houston Plant*

CERTIFIED MAIL: Return Receipt Requested (7010 0290 0000 3114 1694)

June 3, 2011

Texas Commission on Environmental Quality
Air Permits Division
Air Permits Initial Review Team, MC-161
P.O. Box 13087
Austin, TX 78711-3087

Re: Rhodia, Inc.
Houston, Texas
Permit Amendment
TCEQ Air Permit No.: 4802
Account No.: HG-0697-O
TCEQ Customer Reference No: CN600125330
TCEQ Regulated Entity No.: RN100220581

Dear Sir or Madame:

Rhodia Inc. owns and operates a facility, the Houston plant in Houston (Harris County), Texas. The Regeneration Unit No. 2 currently operates under the Texas Commission on Environmental Quality (TCEQ) Account Number HG-0697-O. With this submittal, Rhodia is proposing to amend its existing Permit Number 4802 to allow for the installation of a sulfur dioxide abatement system and capacity expansion.

Rhodia entered into a Consent Decree with the US Environmental Protection Agency and the US Department of Justice in 2007. In the Consent Decree settlement, Rhodia agreed to install sulfur dioxide abatement at four of its sulfuric acid manufacturing facilities. The Houston plant's No. 8 Unit, TCEQ Permit Numbers 19282 and PSD-TX-1081, had its sodium based sulfur dioxide scrubber started up in November 2009. Regeneration Unit No. 2 is the last of the four sulfuric acid units to have sulfur dioxide abatement installed. The Consent Decree compliance date for Regeneration Unit No. 2 is April 1, 2014.

Rhodia requests the TCEQ give this amendment request for Permit Number 4802 a higher priority for review to enable the installation and start-up of the sulfur dioxide abatement system by the Consent Decree's April 1, 2014 deadline.

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

TCEQ
Regen 2 Permit Amendment
Page 2

A copy of this application has been sent to the TCEQ Region 12 Office in Houston, the City of Houston's Bureau of Air Quality Control and to Harris County Pollution Control Department. The registration fees have been sent separately to the Revenue Section of the TCEQ.

If there are any questions, please contact me at (713) 924-1408.

Sincerely,



W. F. Dickerson
Environmental Manager

Attachments

cc: Mr. Manuel Bautista, TCEQ Region 12 – Houston
Mr. Arturo Blanco, City of Houston, Bureau of Air Quality Control
Mr. Bob Allen – Harris County Pollution Control Department
EPA Region 6, Air Permits Division - Dallas

TCEQ PERMIT AMENDMENT APPLICATION
RHODIA INC. ■ HOUSTON PLANT

TCEQ ACCOUNT NUMBER HG-0697-O
TCEQ PERMIT No. 4802

Prepared by:

TRINITY CONSULTANTS
1001 West Loop South
Suite 640
Houston, TX 77027
(713) 552-1360

June 2011

Project 114402.0054

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1. EXECUTIVE SUMMARY

Rhodia Inc. (Rhodia) owns and operates a sulfuric acid manufacturing plant in Houston, Harris County, Texas (Houston Plant). The facility produces sulfuric acid by two processes: combusting elemental sulfur and regenerating spent sulfuric acid (sulfuric acid received from petroleum refining and chemical processes that has been in contact with volatile organic compounds). The facility operates an industrial furnace used to regenerate spent sulfuric acid and commercially incinerate liquid hazardous wastes. The Houston Plant currently operates under the Texas Commission on Environmental Quality (TCEQ) account number HG-0697-O. Rhodia has a TCEQ Customer Reference Number CN600125330 and the Houston plant is registered with a Regulated Entity Number RN100220581.

Rhodia's Sulfuric Acid Regeneration Unit No. 2 (Regen 2) is permitted under TCEQ Permit No. 4802. Regen 2 is an industrial furnace, which produces sulfuric acid from spent sulfuric acid, elemental sulfur, and commercially incinerates liquid hazardous wastes. The storage tanks that hold spent sulfuric acid product and raw material unloading operations are in this permit.

Rhodia entered a consent decree (2:07CV134WL) with the EPA and Department of Justice in August 2007. As part of the consent decree requirements, Rhodia is proposing to install a wet scrubber in Regen 2 for sulfur dioxide (SO₂) reduction at the Houston Plant. Also, as part of this permit amendment application, Rhodia intends to increase production rate of sulfuric acid (H₂SO₄) to 1,150 tons/day.

Additionally, as part of this amendment application, Rhodia proposes to add particulate matter (PM), PM with an aerodynamic diameter of less than 10 microns (PM₁₀), and PM with an aerodynamic diameter of less than 2.5 microns (PM_{2.5}) emissions to TCEQ permit number 4802 for EPN 104. These are existing emissions which were never authorized as such in the permit since the majority of the PM are "condensables" and EPA only recently came out with a test method to sample and quantify these. On March 4, 2011, a meeting was held among the Rhodia, the TCEQ (Dana Vermillion and Johnny Vermillion), and Trinity Consultants Inc. (Trinity) in Austin, Texas. During this meeting, it was agreed that the majority of PM emissions were due to sulfuric acid. Therefore, even though the representation of PM₁₀/PM_{2.5} was not explicit in the TCEQ permit 4802, the TCEQ allowed the inclusion of PM₁₀/PM_{2.5} as a reconciliation effort. However, the TCEQ recommended that a "retrospective" PSD analysis for PM₁₀/PM_{2.5} to be performed for each permit action since the PSD rules became effective. Therefore, as part of this application all relevant federal new source review (FNSR) pollutants have been analyzed during the "retrospective" study. The reconciliation of PM/PM₁₀/PM_{2.5} and study of historical permit amendments for potential PSD review are included in this application.

Rhodia wishes to address the following items in this permit amendment:

- ▲ Add a two-stage wet scrubber after SO₂-laden gas leaves the Brinks mist eliminator. This process will remove the majority of the SO₂ and convert it to different salt forms. It will drastically reduce the emission of SO₂ from the stack. Sodium hydroxide or soda ash may be used as the alkali to feed the scrubber.
- ▲ To support the capacity increase to 1,150 tons of acid/day, Rhodia proposes following modifications, as needed:
 - (1) Add an additional sulfur gun to furnace,
 - (2) Increase catalyst loading in the convertor,
 - (3) Increase size of spent acid feed pump,
 - (4) Replace precipitators, scrubbing tower, and main gas blower steam injectors, and
 - (5) Replace drying tower circulation pump to increase circulation rate.Please note that this is not an all encompassing list but is the best estimate of changes/additions to significant equipment at this point of time in order to get the increased capacity.
- ▲ Review and update all special conditions for current permit to reflect pollution reduction and production increase.
- ▲ Shutdown the existing Unit No. 2 Stack (EPN 104) and route emissions to a new stack near the newly proposed scrubber and assign EPN 104 to it. Reevaluate emission rates for SO₂, oxide of nitrogen (NO_x), H₂SO₄, hydrogen chloride (HCl), chlorine (Cl₂), and carbon monoxide (CO) from the proposed EPN 104.
- ▲ Reconcile PM₁₀ and PM_{2.5} emissions and perform retrospective PSD analysis for all permit amendments since 1977.
- ▲ Add MSS activity for sulfuric acid catalyst screening and authorize related PM₁₀/PM_{2.5} emissions associated with this MSS activity (proposed EPN CATSCNR2).
- ▲ Remove Special Conditions 2, and 3 from current permit to accommodate the SO₂ abatement project. The following is an excerpt of these conditions:

2. The sulfur dioxide (SO₂) emissions from Regeneration Unit No. 2 shall not exceed 15 tons measured over any continuous 24-hour period.

.....

The holder of this permit shall maintain equipment as described in it permit application which will automatically cause the operation of Regeneration Unit No. 2 to cease if the SO₂ emissions exceed for a 30 minute period at a rate which would cause more than 15 tons of SO₂ to be emitted over a 24-hour period.

3. Opacity of emission from the Unit NO. 2 stack shall not exceed 20 percent averaged over a five-minute period.

- ▲ Increase the number of railcars that can be depressurized at any one time from 6 to 8.
- ▲ Add following chemicals to the Approved Chemical List for Hazardous Waste Operations in TCEQ permit 4802:
 - (1) 4-aminophenol (Cas No: 123-30-8), and
 - (2) Diethylaminoacetone (Cas No.: 1620-14-0).

The proposed production increase will also require an increase in the throughput of molten sulfur, which is currently authorized in TCEQ permit 56566. Therefore, permit 56566 will need to be amended, and a permit amendment application to that effect will be submitted to the TCEQ concurrently or soon after this submittal.

Section 2 of this registration contains a completed TCEQ Form PI-1 and Table 1(a). An area map indicating the site location and a plot plan identifying the location of various sources are included in Section 3 and Section 4 of the report. A process flow diagram is provided in Section 5. Process description is included in Section 6. A description on the emission calculations are provided in Section 7. Federal new source review (FNSR) analysis for this project is presented in Sections 8. Historical application FNSR study is provided in Section 9. Permit fee and P.E. certification are provided in Section 10. Material balance is provided in Section 11. Best Available Control Technology (BACT) is illustrated in Section 12. Compliance with general and administrative requirements is demonstrated in Section 13. Air Quality analysis is included in Section 14. Additional impact analysis is included in Section 15. Air quality related values (AQRV) analysis is provided in Section 16. Appendix A includes detailed emission rate calculations, Appendix B includes stack test results. Project increase and netting analysis are in Appendix C. RBLC search is in Appendix D. Land use determination, AERSURFACE results and U.S. Census data are in Appendix E. AERMOD modeling parameters and electronic copies of modeling files are in Appendix F.

2. TCEQ FORMS

PI-1



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
FORM PI-1 GENERAL APPLICATION FOR
AIR PRECONSTRUCTION PERMIT AND AMENDMENTS

Update: The TCEQ requires that a Core Data Form be submitted on all incoming applications unless a Regulated Entity and Customer Reference Number have been issued by the TCEQ and no core data information has changed. For more information regarding the Core Data Form, call (512) 239-5175 or go to the TCEQ Web site at www.tceq.state.tx.us/permitting/central_registry/guidance.html.

I. APPLICANT INFORMATION			
A. Company or Other Legal Name: Rhodia Inc.			
Texas Secretary of State Charter/Registration Number (if applicable):			
B. Company Official Contact Name (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.): William J. McConnell			
Title: Plant Manager			
Mailing Address: 8615 Manchester Street			
City: Houston		State: TX	ZIP Code: 77012
Telephone No: 713-924-1401	Fax No.: 713-835-3252	E-mail Address: William.McConnell@us.rhodia.com	
C. Technical Contact Name (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.): Floyd Dickerson			
Title: Environmental Manager			
Company Name: Rhodia Inc.			
Mailing Address: 8615 Manchester Street			
City: Houston		State: TX	ZIP Code: 77012
Telephone No.: 713-924-1408	Fax No.: 713-835-3261	E-mail Address: Floyd.Dickerson@us.rhodia.com	
D. Facility Location Information:			
Street Address: 8615 Manchester Street			
If no street address, provide clear driving directions to the site in writing:			
City: Houston		County: Harris	ZIP Code: 77012
E. TCEQ Account Identification Number (leave blank if new site or facility): HG-0697-O			
F. Is a TCEQ Core Data Form (TCEQ Form No. 10400) attached?			<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
G. TCEQ Customer Reference Number (leave blank if unknown): CN600125330			
H. TCEQ Regulated Entity Number (leave blank if unknown): RN100220581			
II. IMPORTANT GENERAL INFORMATION			
A. Is confidential information submitted with this application?			<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
If "YES," is each "confidential" page marked "CONFIDENTIAL" in large red letters?			<input type="checkbox"/> YES <input type="checkbox"/> NO



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
FORM PI-1 GENERAL APPLICATION FOR
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II. IMPORTANT GENERAL INFORMATION (continued)

B. Is this application in response to a TCEQ investigation or enforcement action? ☐ YES ☒ NO

If "YES", attach a copy of any correspondence from the TCEQ

C. Number of New Jobs: None

D. Names of the State Senator and district number for this facility site: Senate District 6--Senator Mario Gallegos

Names of State Representative and district number for this facility site: House District 143-- Ana E. Hernandez

E. For Concrete Batch Plants, and PSD, or Nonattainment Permits that require public notice, name of the County Judge for this facility site:

Mailing Address:

City: State: ZIP Code:

F. For Concrete Batch Plants, is the facility located in a municipality or an extraterritorial jurisdiction of a municipality? ☐ YES ☐ NO

If "YES," list the name(s) of the Presiding Officer(s) for this facility site:

Mailing Address:

City: State: ZIP Code:

III. FACILITY AND SOURCE INFORMATION

A. Site Name: Houston Plant

B. Area Name/Type of Facility: No. 2 Regen Unit ☒ Permanent ☐ Portable

C. Principal Company Product or Business: Manufactures sulfuric acid

Principal Standard Industrial Classification Code: 2819

D. Projected Start of Construction Date: Pending Projected Start of Operation Date: April 1, 2014

IV. TYPE OF PERMIT ACTION REQUESTED

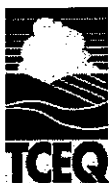
A. Permit Number (if existing): 4802

B. Is this an initial permit application? ☐ YES ☒ NO

If "YES," check the type of permit requested (check all that apply):

- ☐ State Permit ☐ Nonattainment Federal Permit
☐ Flexible Permit ☐ Prevention of Significant Deterioration Federal Permit
☐ Multiple Plant Permit ☐ Hazardous Air Pollutants Permit Federal Clean Air Act § 112(g)

Other: _____



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
FORM PI-1 GENERAL APPLICATION FOR
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IV. TYPE OF PERMIT ACTION REQUESTED <i>(continued)</i>		
C. Is this a permit amendment?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
Is this a permit revision?? (SB 1126 change)	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
If "YES," check the type of permit requested (<i>check all that apply</i>): <input checked="" type="checkbox"/> State Permit Amendment <input type="checkbox"/> Flexible Permit Amendment <input type="checkbox"/> Multiple Plant Permit Amendment <input type="checkbox"/> Nonattainment Major Modification <input checked="" type="checkbox"/> Prevention of Significant Deterioration Major Modification <input type="checkbox"/> Hazardous Air Pollutants Permit Federal Clean Air Act § 112(g) Modification Other: _____		
D. Is a permit renewal application being submitted in conjunction with this amendment in accordance with Senate Bill 1673? [THSC 382.055(a)(2)](80 th Legislative)	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
E. Is this application for a change of location of previously permitted facilities?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
If "YES," answer IVE. 1. - IVE. 4.		
1. Current location of facility:		
Street Address (<i>If no street address, provide clear driving directions to the site in writing.</i>):		
City:	County:	ZIP Code:
2. Proposed location of facility:		
Street Address (<i>If no street address, provide clear driving directions to the site in writing.</i>):		
City:	County:	ZIP Code:
3. Will the proposed facility, site, and plot plan meet all current technical requirements of the permit special conditions?	<input type="checkbox"/> YES <input type="checkbox"/> NO	
If "NO," attach detailed information.		
4. Is the site where the facility is moving considered major?	<input type="checkbox"/> YES <input type="checkbox"/> NO	
F. Is this a relocation?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
G. Are there any standard permits, exemptions or permits by rule to be consolidated into this permit?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
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IV. TYPE OF PERMIT ACTION REQUESTED (continued)	
H. Are you permitting a facility or group of facilities that have planned maintenance, startup and shutdown emissions that cannot be authorized by a permit by rule or standard permit or that are authorized by a permit by rule or standard permit and are being rolled into this permit?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
If "YES," attach information on any changes to emissions under this application as specified in Sections IX, and X.	
If "YES," answer IVH. 1 -IVH. 3.	
1. Are the activities to be included in this permit covered by any previously existing MSS authorizations?	<input type="checkbox"/> YES <input type="checkbox"/> NO
If "YES," provide a listing of all other authorizations (permit by rule or standard permit and the associated registration number if any).	
2. Have the emissions been previously submitted as part of an emissions inventory?	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. List which years the MSS activities were included in emissions inventory submittals:	
I. Federal Operating Permit Requirements (30 TAC Chapter 122 Applicability)	
Is this facility located at a site required to obtain a federal operating permit under 30 TAC Chapter 122?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> To be Determined
1. Identify the requirements of 30 TAC Chapter 122 that will be triggered if this PI-1 application is approved. <input type="checkbox"/> FOP Significant Revision <input type="checkbox"/> FOP Minor <input type="checkbox"/> Application for an FOP Revision <input type="checkbox"/> Operational Flexibility/Off-Permit Notification <input type="checkbox"/> Streamlined Revision for GOP <input checked="" type="checkbox"/> To be determined <input type="checkbox"/> None	
2. Identify the type(s) of FOP(s) issued and/or FOP application(s) submitted/pending for the site (check all that apply) <input type="checkbox"/> GOP Issued <input type="checkbox"/> GOP application/revision application: submitted or under APD review <input type="checkbox"/> SOP Issued <input checked="" type="checkbox"/> SOP application/revision application: submitted or under APD review	
V. PERMIT FEE INFORMATION	
A. Fee paid for this application:	\$50,000.00
1. Is a copy of the check or money order attached to the original submittal of this application?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
2. Is a Table 30 entitled, "Certification of estimated Capital Cost and Fee Verification," attached?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
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VI. PUBLIC NOTICE APPLICABILITY		
A. Is this a new permit application or a change of location application?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
B. Is this an application for a major modification of a PSD, NA or 30 TAC § 112(g) permit?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
C. Is this a state permit amendment application?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
If "YES," answer VIC. 1. - VIC. 3.		
1. Is there any change in character of emissions in this application?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
Is there a new air contaminant in this application?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
2. Do the facilities handle, load, unload, dry, manufacture, or process grain, seed, legumes, or vegetables fibers (agricultural facilities)?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
3. List the total annual emission increases associated with the application (<i>list all that apply</i>):		
Volatile Organic Compounds (VOC):		0 tpy
Sulfur Dioxide (SO ₂):		0 tpy
Carbon Monoxide (CO):		0 tpy
Hazardous Air Pollutants (HAPs):		0 tpy
Nitrogen Oxides (NO _x):		tpy
Particulate Matter (PM):		12.47 tpy
PM ₁₀ :		12.47 tpy
PM _{2.5} :		12.47 tpy
Lead (Pb):		0 tpy
Other air contaminants not listed above: H ₂ SO ₄		0 tpy
VII. PUBLIC NOTICE INFORMATION (<i>complete if applicable</i>)		
A. Responsible Person:		
Name (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.): Floyd Dickerson		
Title: Environmental Manager		
Mailing Address: 8615 Manchester Street		
City: Houston		State: TX
		ZIP Code: 77012
Telephone No.: 713-924-1408		Fax No.: 713-835-3261
E-mail Address: Floyd.Dickerson@us.rhodia.com		



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
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VII. PUBLIC NOTICE INFORMATION (complete if applicable)			
B. Technical Contact:			
Company Name : Rhodia Inc.			
Name (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.): Floyd Dickerson			
Title: Environmental Manager			
Mailing Address: 8615 Manchester Street			
City: Houston		State: TX	ZIP Code: 77012
Telephone No.: 713-924-1408		Fax No.: 713-835-3261	E-mail Address: Floyd.Dickerson@us.rhodia.com
C. Application in Public Place:			
Name of Public Place: Houston Public Library - Melcher Neighborhood Library			
Physical Address: 7200 Keller Street			
City: Houston		County: Harris	
The public place has granted authorization to place the application for public viewing and copying?			<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
The public place has internet access available for the public?			<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Complete VII.D. 1. - VII.D. 3., as applicable.			
D.1. Name of the Mayor for this facility site:			
Annise Parker			
Mailing Address: City of Houston, P.O. Box 1562			
City: Houston		State: TX	ZIP Code: 77251
D.2. Name of the Federal Land Manager for this facility site:			
Mailing Address:			
City:		State:	ZIP Code:
D.3. Name of the Indian Governing Body for this facility site:			
Mailing Address:			
City:		State:	ZIP Code:



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
FORM PI-1 GENERAL APPLICATION FOR
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VII. PUBLIC NOTICE INFORMATION <i>(complete if applicable)</i>				
E. Is a bilingual program required by the Texas Education Code in the School District?				<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Are the children who attend either the elementary school or the middle school closest to your facility eligible to be enrolled in a bilingual program provided by the district?				<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
If "YES," which language is required by the bilingual program?			Spanish	
VIII. SMALL BUSINESS CLASSIFICATION <i>(required)</i>				
A. Does this company (including parent companies and subsidiary companies) have fewer than 100 employees or less than \$6 million in annual gross receipts?				<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
B. Is the site a major source under 30 TAC Chapter 122, Federal Operating Permit Program?				<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
C. Are the site emissions of any individual air contaminant greater than 50 tpy?				<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
D. Are the site emissions of all air contaminants combined greater than 75 tpy?				<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
IX. TECHNICAL INFORMATION				
A. Is a current area map attached?				<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Are any schools located within 3,000 feet of this facility?				<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
B. Is a plot plan of the plant property attached?				<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
C. Is a process flow diagram and a process description attached?				<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
D. Maximum Operating Schedule:	Hours: 24 hr/day	Day(s): 7 days/wk	Week(s): 52 wk/yr	Year(s): 8760 hr/yr
Seasonal Operation?				<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
If "YES," please describe.				
E. Are worst-case emissions data and calculations attached?				<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
1. Is a Table 1(a) entitled, "Emission Point Summary Table," attached?				<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Is a Table 2 entitled, "Material Balance Table," attached?				<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3. Are equipment, process, or control device tables attached?				<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
F. Are actual emissions for the last two years (determination federal applicability) attached?				<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
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X. STATE REGULATORY REQUIREMENTS	
<i>Applicants must be in compliance with all applicable state regulations to obtain a permit or amendment.</i>	
A. The emissions from the proposed facility will comply with all rules and regulations of the TCEQ and details are attached?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
B. The proposed facility will be able to measure emissions of significant air contaminants and details are attached?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
C. A demonstration of Best Available Control Technology (BACT) is attached?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
D. The proposed facilities will achieve the performance in the permit application and compliance demonstration or record keeping information is attached?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
E. Is atmospheric dispersion modeling attached?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
F. Does this application involve any air contaminants for which a "disaster review" is required?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
If "YES," details must be attached.	
<i>Note: For a list of air contaminants for which a "disaster review" will be required, refer to the NSRPD Disaster Review Guidance Document at www.tceq.state.tx.us/permitting/air/rules/federal/63/63hmpg.html.</i>	
G. Is this facility or group of facilities located at a site within an Air Pollutant Watch List (APWL) area?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
If "YES," answer X.G. 1. - X.G. 3.	
1. List the APWL Site Number:	
2. Does the site emit a pollutant of concern for the APWL area in which the site is located?	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. If "YES," list the pollutant(s) of concern emitted by this site:	
H. Is this facility or group of facilities located at a site within the Houston/Galveston nonattainment area? (Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, or Waller Counties)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
If "YES," answer X.H. 1. - X.H. 4.	
1. Does the facility or group of facilities located at this site have an uncontrolled design capacity to emit 10 tpy or more of NO _x ?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Is this site subject to 30 TAC Chapter 101, Subchapter H, Division 3 (Mass Emissions Cap and Trade)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3. Does this action make the site subject to 30 TAC Chapter 101, Subchapter H, Division 3 (Mass Emissions Cap and Trade)?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. Does this action require the site to obtain additional emission allowances?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
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XI. FEDERAL REGULATORY REQUIREMENTS

Applicants must be in compliance with all applicable federal regulations to obtain a permit or amendment. If any of the following questions are answered "YES, the application must contain detailed attachments addressing applicability, identify federal regulation Subparts, show how requirements are met, and include compliance information.

A. Does a Title 40 Code of Federal Regulations Part 60, (40 CFR Part 60) New Source Performance Standard (NSPS) apply to a facility in this application?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
B. Does 40 CFR Part 61, National Emissions Standard for Hazardous Air Pollutants (NESHAP) apply to a facility in this application?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
C. Does a 40 CFR Part 63, Maximum Achievable Control Technology (MACT) standard apply to a facility in this application?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
D. Does nonattainment permitting requirements apply to this application?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
E. Does prevention of significant deterioration permitting requirements apply to this application?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
F. Does Hazardous Air Pollutant Major Source [FAA § 112(g)] requirements apply to this application?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

XII. COPIES OF THIS APPLICATION

A. Has the required fee been sent separately with a copy of this Form PI-1 to the TCEQ Revenue Section? (MC 214, P.O. Box 13088, Austin, Texas 78711).	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NA
B. Are the Core Data Form, Form PI-1, and all attachments being sent to the TCEQ in Austin?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
OPTIONAL: Has an extra copy of the Core Data Form, Form PI-1 and all attachments been sent to the TCEQ in Austin?	<input type="checkbox"/> YES <input type="checkbox"/> NO
If "YES," please mark this application as "COPY."	
C. Is a copy of the Core Data Form, the Form PI-1, and all attachments being sent to the appropriate TCEQ regional office?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
D. Is a copy of the Core Data Form, the Form PI-1, and all attachments being sent to each appropriate local air pollution control program(s)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
List all local air pollution control program(s): Harris County, City of Houston	
E. Is a copy of the Core Data Form, Form PI-1, and all attachments (without confidential information) being sent to the EPA Region 6 office in Dallas, Texas? (federal applications only)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
F. This facility is located within 100 kilometers of the Rio Grande River and a copy of the application was sent to the International Boundary and Water Commission (IBWC):	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
G. This facility is located within 100 kilometers of a federally-designated Class I area and a copy of the application was sent to the appropriate Federal Land Manager:	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
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XIII. PROFESSIONAL ENGINEER (P.E.) SEAL

Is the estimated capital cost of the project greater than \$2 million dollars?

☒ YES ☐ NO

If "YES," the application must be submitted under the seal of a Texas licensed Professional Engineer (P.E.).

XIV. DELINQUENT FEES AND PENALTIES

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ is paid in accordance with the "Delinquent Fee and Penalty Protocol." For more information regarding Delinquent Fees and Penalties, go to the TCEQ Web site at:
www.tceq.state.tx.us/agency/delin/index.html.

XV. SIGNATURE

The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7, Texas Clean Air Act (TCAA), as amended, or any of the air quality rules and regulations of the Texas Commission on Environmental Quality or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. I further state that I have read and understand TWC §§ 7.177-7.183, which defines CRIMINAL OFFENSES for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and TWC § 7.187, pertaining to CRIMINAL PENALTIES.

NAME: William J. McConnell

SIGNATURE: _____

William J. McConnell

Original Signature Required

DATE: _____

5/31/11

Federal Regulatory Requirements for PI-1

Regen 2 is a sulfuric-acid making process. In addition, the furnace of the process combust RCRA wastes and other hazardous wastes from different industries. It has a FIN of PRO-REGEN2 in Title V Permit 3049.

40 CFR Part 60

Subpart A: General Provisions

Subpart Cd: Emissions Guidelines and Compliance Times for Sulfuric Acid Production Units

Subpart H: Standards of Performance for Sulfuric Acid Plants

40 CFR Part 61

Subpart FF: National Emission Standard for Benzene Waste Operations

40 CFR Part 63

Subpart G: National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater

Subpart XX: Ethylene Manufacturing Process Units: Heat Exchange Systems and Waste Operations

Subpart GGG: Pharmaceuticals Production.

Table 1(a)



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

Date	6/1/2011	Permit No.:	4802	Regulated Entity No.:	RN100220581
Area Name	Houston Plant			Customer Reference	CN600125330

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

AIR CONTAMINANT DATA					
1. Emission Point			2. Component or Air Contaminant Name	3. Air Contaminant Emission Rate	
(A) EPN	(B) FIN	(C) NAME		(A) Pounds per Hour	(B) TPY
104	PRO-REGEN2	Unit No. 2 Stack	CO	5.70	25.00
			CO ₂ -e	43627.01	152869.03
			Cl ₂	0.01	0.05
			H ₂ SO ₄	7.19	20.99
			HCl	0.16	0.70
			NO _x	37.20	61.95
			PM	4.01	12.47
			PM ₁₀	4.01	12.47
			PM _{2.5}	4.01	12.47
			SO ₂	143.75	377.78
			VOC	0.01	0.01
CATSCNR2	CATSCNR2	Catalyst Screening for Regen 2 Converter	PM	6.57E-03	7.17E-04
			PM ₁₀	6.57E-03	7.17E-04
			PM _{2.5}	6.57E-03	7.17E-04

EPN = Emission Point Number
FIN = Facility Identification Number



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

Date	6/1/2011	Permit No.:	4802	Regulated Entity No.:	RN100220581
Area Name	Houston Plant	Customer Reference No.:	CN600125330		

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

AIR CONTAMINANT DATA													
1. Emission Point			4. UTM Coordinates of Emission Point			Source							
(A) EPN	(B) FIN	(C) NAME	Zone	East (meters)	North (meters)	5. Building Height (ft.)	6. Height Above Ground (ft.)	7. Stack Exit Data			8. Fugitives		
								(A) Diameter (ft.)	(B) Velocity (fps)	(C) Temperature (°F)	(A) Length (ft.)	(B) Width (ft.)	(C) Axis Degrees
104	PRO-REGEN2	Unit No. 2 Stack	15	280224	3290031		130	3.5	95.5	89			
CATSCNR2	CATSCNR2	Catalyst Screening for Regen 2 Converter	15	280213	3290019		8	0.67	164.0	70			

EPN = Emission Point Number

FIN = Facility Identification Number

TCEQ Table 13 (Scrubber or Wet Washers)

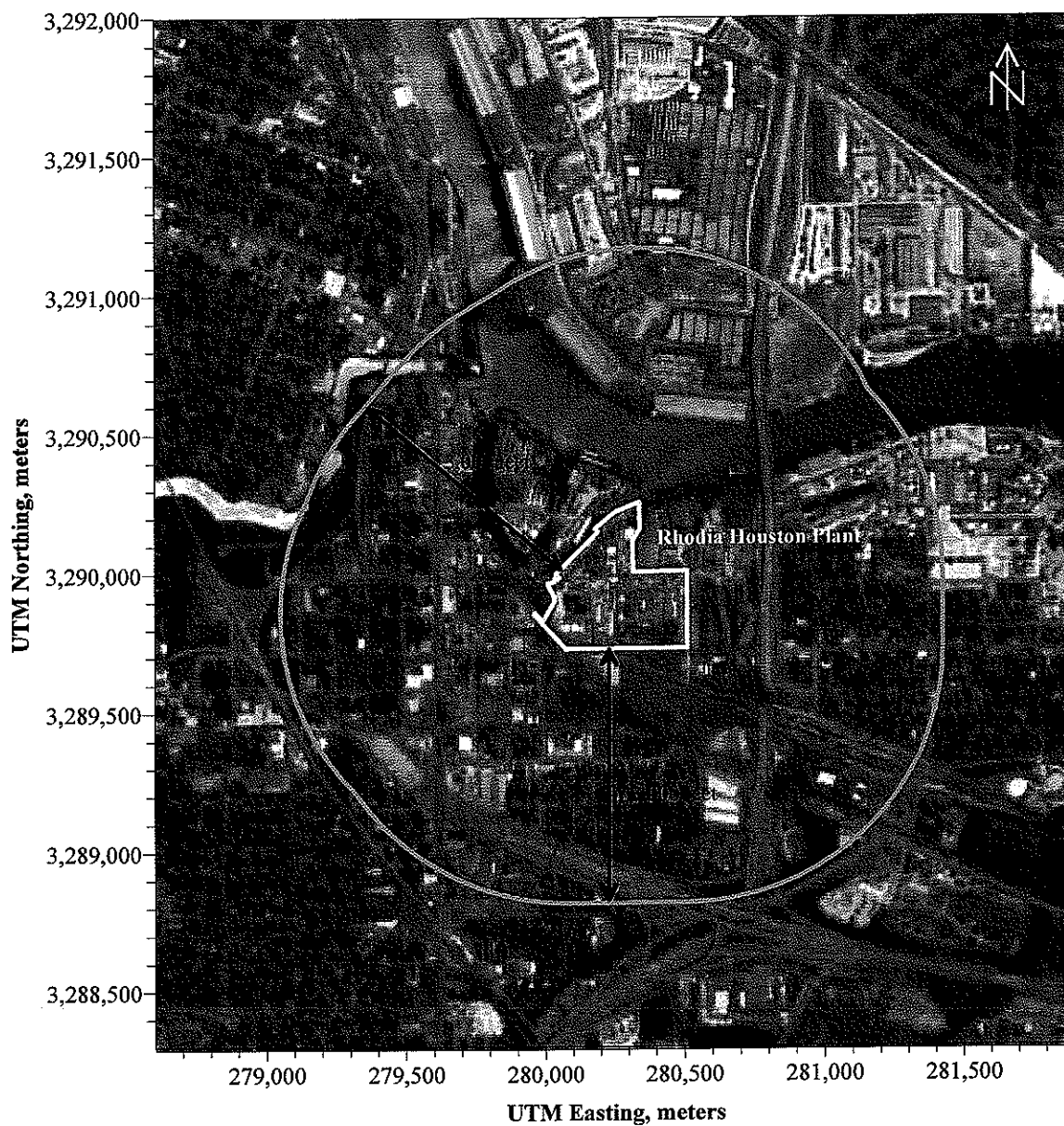
TABLE 13
SCRUBBERS OR WET WASHERS

Point Number(from Flow Diagram) EPN 104		Manufacturer & Model No. (if available)			
Name of Abatement Device Sodium Based Scrubber for Regen 2		Type of Air Contaminant Controlled Sulfur Dioxide			
GAS STREAM CHARACTERISTICS					
Flow Rate (acfm)		Gas Stream Temperature (°F)		Particulate Grain Loading Inlet (grain/scf) Outlet	
Design Maximum 60,300 (acfm inlet)	Average Expected 51,400 (acfm inlet)	Inlet 140 – 220°F	Outlet 70 – 100°F	0.001–0.008 grain/scf (roughly 0.05 to 0.5 mg/scf)	0.001 – 0.008 grain/scf (roughly 0.05 to 0.5 mg/scf)
PARTICULATE DISTRIBUTION (By Weight)					
Micron Range		Inlet		Outlet	
0.0-1.0		_____ %		_____ %	
0.1-3.0		_____ %		_____ %	
3.0-5.0		_____ %		_____ %	
5-10		_____ %		_____ %	
10-20		_____ %		_____ %	
over 20		_____ %		_____ %	
SCRUBBING LIQUID CHARACTERISTICS					
Scrubbing Liquid		Liquid Injection Rate (gpm)			
Composition Wt. % 1. NaHSO ₃ 5 – 35 % 2. Na ₂ SO ₃ 0 – 15 % 3. Na ₂ SO ₄ 0 – 10 % 4. H ₂ O 65 – 90 %		Design Maximum Estimated 575 gpm		Average Expected 400-500 GPM	
		Pressure at Spray Nozzle _____ n/a _____ psia		Pressure Drop Through Scrubber _____ 3-15 _____ H ₂ O	
Type of Scrubber: <input type="checkbox"/> Spray Chamber <input type="checkbox"/> Orifice <input type="checkbox"/> Venturi <input type="checkbox"/> Cyclone <input type="checkbox"/> Mechanical x Packed Tower Type					
Data for Venturi Scrubber			Data for Packed Towers		
Throat Dimensions (Specify Units) n/a	Throat Velocity (ft/sec) n/a	Type of Packing 3 " superintalox saddles or equivalent (e.g. 3 ½" Flexirings or 90 mm Hiflow rings)		Superficial Gas Velocity through Bed 2 – 10.5 ft/s	
Capital Installed Cost \$ 5,000,000			Annual Operating Cost \$		

On separate sheets attach the following:

- A. Details regarding principle of operation
- B. An assembly drawing (Front and Top View) of the abatement device dimensioned and to scale clearly showing the design, size and shape. If the device has bypasses, safety valves, etc., include in drawing and specify when such bypasses are to be used and under what conditions.

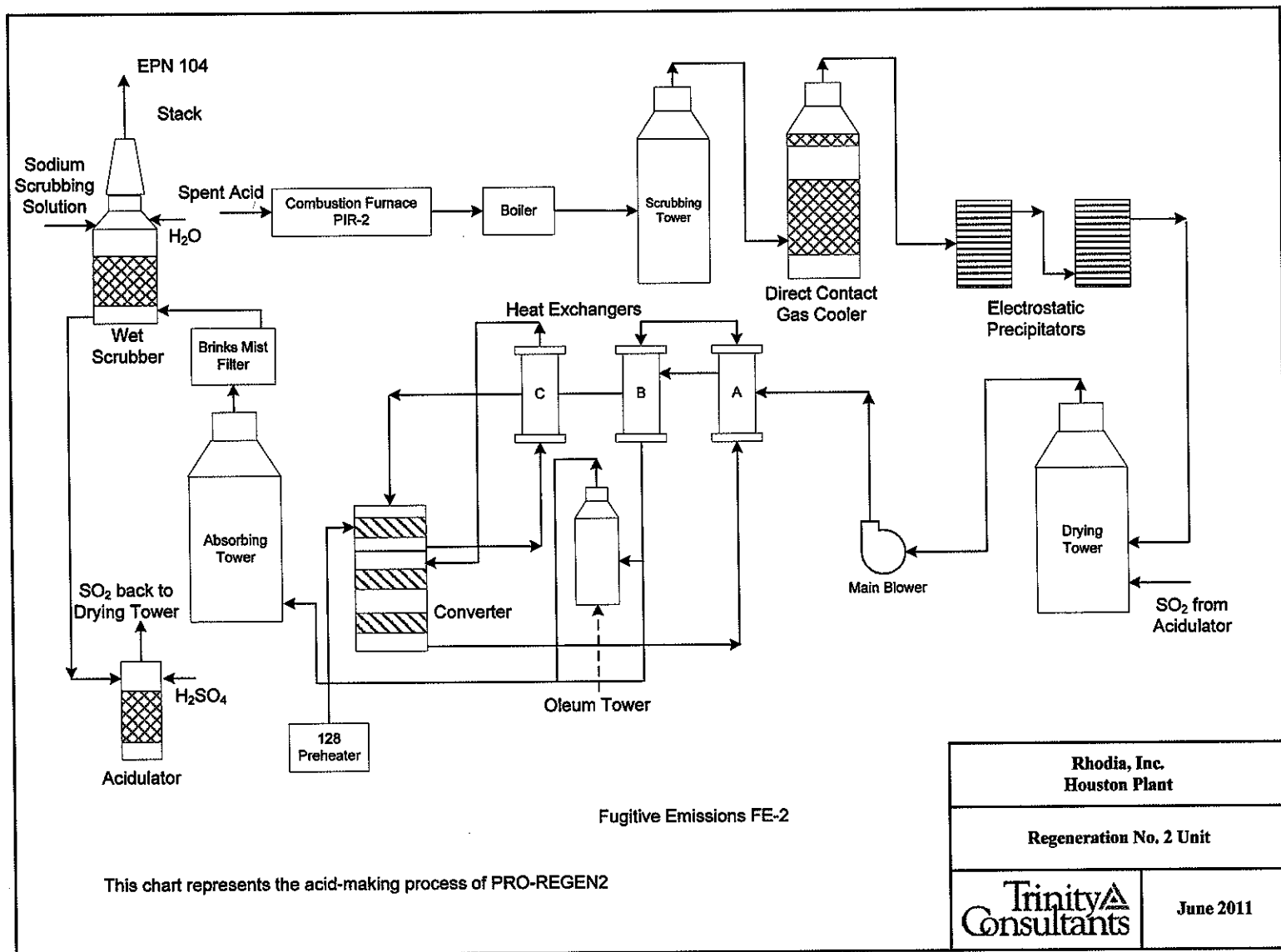
3. AREA MAP



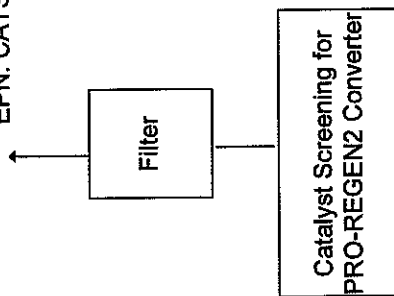
Referenced Universal Transverse Mercator (UTM) coordinates are in North American Datum 83 (NAD 83) datum.

4. PLOT PLAN

5. PROCESS FLOW DIAGRAMS



EPN: CATSCNR2



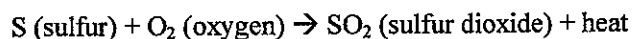
Rhodia, Inc. Houston Plant	
Regen 2 - Catalyst Screening	
Trinity Consultants	May 2011

6. PROCESS DESCRIPTION

6.1 REGEN 2 UNIT

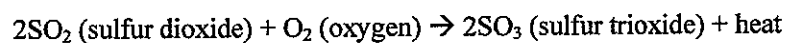
The following section describes the technique used to convert spent sulfuric acid and sulfur to sulfuric acid at Rhodia's Sulfuric Acid Regeneration Unit No. 2. This process is made up of six main stages: combustion, wet gas purification, conversion, absorption, SO₂ recovery and heat recovery found throughout the process.

Spent sulfuric acid and molten sulfur are delivered to the facility by barge and tank truck. Sulfur is stored in two heated tanks and spent sulfuric acid is stored in five storage tanks. The spent sulfuric acid and molten sulfur are sprayed into the industrial furnace and burned at a high temperature with excess dry air to produce sulfur dioxide, as illustrated by the following equations. Liquid hazardous wastes are used as supplemental fuel and are combusted along with the spent sulfuric acid and the molten sulfur in the industrial furnace.



After leaving the furnace, the process gas stream containing sulfur dioxide is cooled in a waste heat boiler. The process gas then goes through gas cleaning, cooling, and mist removal equipment that consists of a scrubbing tower, a direct contact gas cooler and two electrostatic precipitators.

The sulfur dioxide, in gaseous state, is then reacted with dry air in a catalytic converter producing sulfur trioxide:

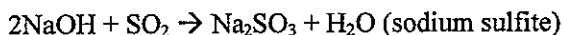


The SO₃ stream passes through an oleum tower where product sulfuric acid is initially collected and a portion of SO₃ gas is removed. Finally, the remaining sulfur trioxide is absorbed in strong acid in an absorbing tower to produce sulfuric acid.

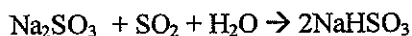
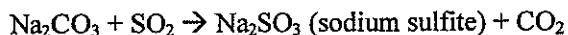
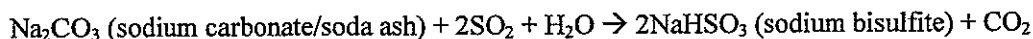


The process gas then enters a Brinks mist eliminator where H₂SO₄ mist is removed. Exhaust gas (containing residual SO₂) leaves the Brinks mist eliminator and enters the bottom of the newly added sodium based wet scrubber. Different forms of sodium salts are formed when SO₂ contacts with Na₂CO₃ solution.

Sodium hydroxide reacts with the sulfur dioxide in the tail gas by the following reactions:



Or if using soda ash as the alkali:



A significant amount of SO_2 will be captured in this step. Soda ash or caustic soda is added to the top stage at a rate sufficient to maintain the SO_2 emissions at the required level. Water is added to the top stage circulating system as make up for the water evaporated from the solution by the gas, and to maintain the scrubber bottom stage solution dissolved solids at a value to maintain the salts in solution.

The salt solution is sent to an acidulator located in Regen 2. Sulfuric acid reacts with the salt solution and SO_2 is recovered from the solution. SO_2 is sent back to the gas drying tower to increase sulfuric acid production. SO_2 dissolved in the sodium salt solution is reduced to a minimum level by air stripping.

And the acidulation reaction is:



Remaining gas leaves the scrubber through the attached 130-foot discharge height stack (EPN 104). Emissions include H_2SO_4 mist not removed by the Brinks unit, SO_2 that was not captured by the scrubber, CO and NO_x combustion product.

The absorption of SO_3 in the absorbing tower, as well as water in the drying tower, is an exothermic reaction, necessitating cooling of the circulating strong sulfuric acid. State-of-the-art anodically protected stainless steel shell and tube heat exchangers are used for cooling.

6.2 CATALYST SCREENING

Catalyst in converters needs to be screened and cleaned each year. This is a planned MSS activity. Rhodia estimates that the activities can be performed in 218 hours each year. The PM, PM_{10} , and $\text{PM}_{2.5}$ emissions are routed to a bag filter with an outlet grain loading of less than 0.01 grain/scf.

7. EMISSIONS CALCULATIONS

This section presents the maximum hourly and total annual emission rates of the Sulfuric Acid Regeneration 2 Unit.

7.1 REGEN 2 SULFURIC ACID UNIT

7.1.1 SULFUR DIOXIDE EMISSIONS

The major pollutant from Sulfuric Acid Regeneration Unit No. 2 (EPN 104) is SO₂. The current stack will be retired after the newly proposed abatement process (wet scrubber) is installed. A new stack will be installed at the wet scrubber. The discussion below reviews the newly proposed abatement process.

With the installation of a wet scrubber, Rhodia has estimated that maximum hourly SO₂ emission from the stack will be 3 lb SO₂/ton acid produced as a result of variation in production. Through the course of a year, the emission factor for SO₂ is estimated about 1.8 lb SO₂/ton of acid produced.

Hourly emission of SO₂ is:

$$SO_2 = 3 \frac{lb}{ton} \times 1,150 \frac{ton}{day} \times \frac{1 day}{24 hr} = 143.75 \frac{lb}{hr}$$

Annual emission of SO₂ is:

$$SO_{2, Annual} = 1.8 \frac{lb}{ton} \times 1,150 \frac{ton}{day} \times \frac{365 day}{year} \times \frac{1 ton}{2,000 lb} = 377.78 \frac{ton}{year}$$

As a result of the abatement, more than 90% of current SO₂ emission will be eliminated. Rhodia will be able to determine annual compliance based on data from the SO₂ CEMS.

7.1.2 H₂SO₄ EMISSIONS

Some H₂SO₄ mist can be trapped in the waste stream and emitted from the stack (EPN 104). Since the introduction of the wet scrubber changes the process and due to the increase of production, new test data will be needed to estimate the emission rate of H₂SO₄. However, Rhodia conservatively estimates the acid mist emission rate will be 0.10 lb H₂SO₄/ton acid produced for annual emission rate. Based on 40 CFR Part 60, Subpart H, the short-term hourly emission rate is 0.15 lb H₂SO₄/ton acid produced.

Hourly emission of H₂SO₄ is:

$$H_2SO_4 = 0.15 \frac{lb}{ton} \times 1,150 \frac{ton}{day} \times \frac{1 day}{24 hr} = 7.19 \frac{lb}{hr}$$

Annual emission of H_2SO_4 is:

$$H_2SO_4, Annual = 0.1 \frac{lb}{ton} \times 1,150 \frac{ton}{day} \times \frac{365 day}{year} \times \frac{ton}{2000 lb} = 20.99 \frac{ton}{year}$$

7.1.3 NO_x EMISSIONS

Hourly Emissions of NO_x are estimated using a concentration value of 96.8 ppmv based on a prior stack test. The maximum design flow rate is 55,145 acfm. A sample calculation for hourly and yearly emission of NO_x is shown here.

$$NO_x = \frac{96.8}{1,000,000} \times \frac{1.0123 atm}{549 R} \times \frac{55145 ft^3}{min} \times \frac{60 min}{hr} \times \frac{46 lb}{lbmole} \times \frac{lbmole - R}{0.7302 atm - ft^3} = 37.20 \frac{lb}{hr}$$

Annual NO_x emissions are estimated based on Federal New Source Review applicability analysis (section 8.3) and setting the "projected actual emissions" to be 61.95 tpy.

7.1.4 PM, PM_{10} AND $PM_{2.5}$ EMISSIONS

For this application, Rhodia proposes to use stack tests results from a similar process, which is located in Rhodia Baton Rouge Plant. The Unit 2 at Baton Rouge Plant has an identical acid-making process like the Houston Regen 2. In February 2011, Rhodia performed stack test of PM at Unit 2 using EPA Method 5 and revised Method 202. The production rate of Unit 2 at Baton Rouge was 1,514.9 tons of acid/day (63.12 tons/hour) during the test. The test result is in Table B-1 of Appendix B. A copy of relevant pages from stack test report is also provided in appendix B.

During the test, the maximum short-term PM emission was 5.28 lb/hr, while the average emission rate was 3.75 lb/hr. Considering the difference of production rate between the two plants, a production ratio is used to estimate the emission rates for Houston Plant Regen 2 unit. All PM is assumed to be $PM_{10}/PM_{2.5}$.

$$PM, PM_{10/2.5} = \frac{5.28 lbs}{hour} \times \frac{1,150 tons}{1,514.9 tons} = 4.01 \frac{lb}{hr}$$

$$PM, PM_{10/2.5}, Annual = \frac{3.75 lbs}{hour} \times \frac{1,150 tons}{1,514.9 tons} \times \frac{8,760 hr}{year} \times \frac{ton}{2,000 lb} = 12.47 tpy$$

7.1.5 VOC AND CO EMISSIONS

There is no change to VOC and CO emission calculations.

7.1.6 GREENHOUSE GAS EMISSIONS

Greenhouse gas (GHG) emissions from Regen 2 are only related to carbon dioxide (CO_2). There are no other GHG gases. Stack test for Regen 2 was performed in October 2010. The results are in Table

B-2 of Appendix B. A copy of relevant pages from stack test report is also provided in appendix B. The average CO₂ concentration was 8% by volume. The average exhaust flow rate was 53,295 acfm. The current design production rate is 969 tons of acid/day. To be conservative and be consistent with other calculations, the flow rate is adjusted to 55,145 acfm, and 549 R is used for the temperature. For short-term emission rate, the CO₂ concentration is assumed at 10% by volume. For long-term emission rate, the average concentration of 8% is used. A ratio of proposed production rate to current production rate (1,150/969) is applied to the estimation.

$$CO_2 = 10\% \times 1.0123 \text{ atm} \times \frac{55,145 \text{ ft}^3}{\text{min}} \times \frac{60 \text{ min}}{\text{hr}} \times \frac{44 \text{ lb}}{\text{lbmole}} \times \frac{1}{549 \text{ R}} \times \frac{\text{lbmole} - R}{0.73024 \text{ atm} - \text{ft}^3} \times \frac{1150}{969} = 43,627 \frac{\text{lb}}{\text{hr}}$$

$$CO_{2, \text{Annual}} = 43,627 \frac{\text{lb}}{\text{hr}} \times \frac{8\%}{10\%} \times \frac{8760 \text{ hr}}{\text{year}} \times \frac{\text{ton}}{2,000 \text{ lb}} = 152,869 \text{ tpy}$$

7.1.7 HCL AND CL₂ EMISSIONS

Emissions of HCl and Cl₂ are based on the feed rate of chlorinated materials from hazardous waste permit HW50095. The new feed rate established for permit HW50095 is 503 lb as Chlorine per hour. The HCl removal efficiency is 99.969% for the unit. Trial burn conducted before found that Cl₂ to HCl ratio is 1 lb/Cl₂ to 14.706 lbs of HCl.

$$HCl = \frac{503 \text{ lbs}}{\text{hour}} \times (1 - 99.969\%) \times \frac{36.5}{35.5} = 0.16 \frac{\text{lb}}{\text{hr}}$$

$$HCl_{\text{Annual}} = \frac{0.16 \text{ lb}}{\text{hour}} \times \frac{8760 \text{ hr}}{\text{year}} \times \frac{\text{ton}}{2000 \text{ lb}} = 0.7 \text{ tpy}$$

$$Cl_2 = 0.16 \frac{\text{lb}}{\text{hr}} \times \frac{1}{14.706} = 0.011 \frac{\text{lb}}{\text{hr}}$$

$$Cl_{2, \text{Annual}} = \frac{0.011 \text{ lb}}{\text{hour}} \times \frac{8760 \text{ hr}}{\text{year}} \times \frac{\text{ton}}{2000 \text{ lb}} = 0.048 \text{ tpy}$$

A summary of emission rates from the Regen 2 unit is provided in the table below.

Table 7-1. Proposed Emission Rates from Unit No. 2 Stack (EPN 104)

Pollutant	lb/hr	tpy
NO _x	37.20	61.95
CO	5.70	25.00
SO ₂	143.75	377.78
H ₂ SO ₄	7.19	20.99
PM	4.01	12.47
PM ₁₀	4.01	12.47
PM _{2.5}	4.01	12.47
HCl	0.16	0.70
Cl ₂	0.011	0.048
CO ₂ -e	43,627	152,869
VOC	0.01	0.01

7.2 CATALYST SCREENING

Catalyst in the converter needs to be replaced and screened each year. The estimated schedule is 218 hours per year. The PM emissions are estimated using the total volume of the material, the density of the material, the amount that is airborne, and the control efficiency of the bag filter. All PM emissions are assumed to be PM₁₀ /PM_{2.5}.

$$PM, PM_{10/2.5} = \frac{200,000 \text{ lit}}{\text{year}} \times \frac{1 \text{ year}}{218 \text{ hr}} \times \frac{1 \text{ m}^3}{1,000 \text{ lit}} \times \frac{650 \text{ kg}}{\text{m}^3} \times \frac{2.205 \text{ lb}}{\text{kg}} \times 0.05\% \times (1 - 99\%) = 6.57 \times 10^{-3} \frac{\text{lb}}{\text{hr}}$$

$$PM, PM_{10/2.5, \text{Annual}} = 6.57 \times 10^{-3} \frac{\text{lb}}{\text{hr}} \times \frac{218 \text{ hr}}{\text{year}} \times \frac{\text{ton}}{2,000 \text{ lb}} = 7.17 \times 10^{-4} \text{ tpy}$$

Table 7-2 Emission Rates from Catalyst Screening (EPN CATSCNR2)

Pollutant	lb/hr	tpy
PM	6.57×10^{-3}	7.17×10^{-4}
PM ₁₀	6.57×10^{-3}	7.17×10^{-4}
PM _{2.5}	6.57×10^{-3}	7.17×10^{-4}

8. FNSR ANALYSIS

Rhodia Houston Plant is located in Harris County. This is an area of severe ozone nonattainment. The Houston Plant is an existing major stationary source. According to 30 TAC §116.150 and §116.160, this site needs to evaluate both nonattainment (NA) and prevention of significant deterioration (PSD) applicability.

8.1 PROJECT SCOPE

The project plans to have a production rate increase for Regen 2. It will also install a caustic scrubber (EPN 104) for SO₂ reduction in Regen 2 and increase the feed to the furnace. However, the spent acid tanks, vapor combustors, preheater, and fugitive areas associated with these facilities will not be affected by this project.

8.2 PSD APPLICABILITY

Based on 30 TAC §116.160(b), the netting is required unless the proposed emissions increases associated with a project, without regard to decreases, are less than major modification thresholds for the pollutant identified in 40 Code of Federal Regulations (CFR) §52.21(b)(23).

The first step in the PSD analysis is to determine if the project increase (proposed allowable emissions – baseline actual emissions) is less than the significant emissions rate (SER). This analysis is shown in table below for each criteria pollutant subject to PSD regulations.

Table 8-1 Project Increase for PSD Applicability

Pollutant	Proposed Allowable, tpy	Baseline Actual, tpy	Increase, tpy	SER, tpy	Netting?
SO ₂	377.78	4007.6	0	40	NO
CO	25	0	25	100	NO
PM	12.47	6.5	5.97	25	NO
PM ₁₀	12.47	6.5	5.97	15	NO
PM _{2.5}	12.47	6.5	5.97	10	NO
H ₂ SO ₄	20.99	10.94	10.05	7	YES
CO ₂ -e	152,869.03	79,671.80	73,197.22	75,000	NO

Since the allowable emissions for CO is less than the SER, the baseline for CO is assumed to be zero. For all other pollutants, the baseline calculation based on any consecutive 24-months in the past 10 years can be found in Appendix C of this application.

As shown in Table 8-1, project increases for CO, PM, PM₁₀, PM_{2.5} and GHG do not exceed the SER. For SO₂, there is a net reduction of annual SO₂ emissions. As a result, these pollutants do not trigger PSD review.

For H₂SO₄, the project increase exceeds its corresponding SER. The next step should be using the netting and evaluate all creditable emission increases and decreases during the contemporaneous period for this pollutant to observe if the site can “net out” of PSD. However, since the EPN 104 stack contributes to a significant portion of the site-wide emissions, and there is no known significant decrease of emissions from the site during the contemporaneous period for this amendment application.

8.3 NA APPLICABILITY

Since the site is in a severe ozone nonattainment area and is major, there are two steps for NA analysis based on 30 TAC §116.150.

The first step is to see if the project increase, without considering decrease, is less than 5 tpy of each nonattainment pollutant in this area. For ozone, the pollutants are VOC and NO_x.

Table 8-2 Project Increase for NA Applicability

Pollutant	Proposed Allowable, tpy	Baseline Actual, tpy	Increase, tpy	Limit, tpy	Netting?
NO _x	61.95	57.02	4.92	5	NO
VOC	0.01	0	0.01	5	NO

Rhodia does not intend to change the allowable VOC rate from current value (0.01 tpy). Since VOC allowable emissions are less the NA trigger of 5 tpy, the baseline for VOC is assumed to be zero. Therefore, VOC passes the test and no NA review is required.

For NO_x, Rhodia is electing to limit the “Projected Actual Emissions” to 61.95 tpy from EPN 104 in order to stay below 5 tpy and avoid contemporaneous netting (and potential Non attainment NSR). Details of baseline calculation and project increase can be found in Appendix C.

9. HISTORICAL APPLICATION FNSR ANALYSIS

As discussed in Section 1, to address the issue of reconciling PM₁₀/PM_{2.5} emissions in the permit baseline (related to the Federal New Source Review), the TCEQ has requested a retrospective project increase analysis for all permit actions (amendment or renewal) pertinent to PSD review since the effective date of PSD rules (NSR August 1977). This section addresses this topic. All permit applications are listed in a chronological order beginning with the latest change (December 3, 2010) to the oldest permit application right before August 1977. This does not take into any of the PBRs and standard permits that the site may have historically utilized.

1. TCEQ Received Date December 3, 2010, Issuance Date February 8, 2011, TCEQ Project No. 161773

Project Description

A vessel attached to the Brinks mist eliminator is found to have some mechanical defects due to wear and tear. Rhodia decided to replace the vessel with an identical one to ensure safe operation. Since this was a replacement in kind, there were no emission rates changes.

Project Increase

Per the application representation, the replacement of the vessel was deemed a routine maintenance activity. According to 30 TAC §116.12 (18)(B)(i), this replacement was not a "physical change or change in the method of operation". Therefore, the project increase was zero. This permit amendment did not trigger PSD review.

2. TCEQ Received Date March 29, 2010, Issuance Date August 20, 2010, TCEQ Project No. 156557

Project Description

Due to operational and safety concerns, Rhodia decided to take voluntary actions to reduce the short-term (lbs/hr) VOC emissions from vapor combustor EPN 170. Rhodia also wanted to seek authorization of a caustic scrubber (EPN 122) during periods of startup of EPN 170.

Project Increase

The caustic scrubber (EPN 122) and vapor combustor 2 (EPN 170) were affected by this amendment. Table 9-1 shows the allowable emission rates (tons/year) that were authorized in the final MAER table dated August 20, 2010. In order to simplify the analysis, baseline emissions for all pollutants are assumed to be zero. The allowable emission rates are directly compared to the threshold limits. As shown in Table 9-2, none of the pollutants had a project increase greater than the threshold limit. Therefore, this permit amendment did not trigger PSD or NA review. Since the vapor combustor was operated and designed like a flare, there were no visible emissions. Hence, there were no PM emissions.

Table 9-1 Annual Emission Rates

EPN	Description	Pollutant	tpy
122	Caustic Scrubber	SO ₂	0.01
	(EPN 170 Startup)	VOC	2.02
170	Vapor Combustor 2	CO	0.3
	(Normal Operation)	NO _x	0.15
		SO ₂	0.01
		VOC	0.01
170	Vapor Combustor 2	CO	4.85
	(Furnace MSS)	NO _x	0.57
		SO ₂	0.13
		VOC	0.86
		HCl	0.13
		Cl ₂	0.03
170	Vapor Combustor 2	CO	1.48
	(Storage Tanks Planned	NO _x	0.17
	Inspection Purge	SO ₂	0.01
	Control Option One)	VOC	0.01

Table 9-2 Project Increase for PSD and NA Review

Pollutant	Baseline, tpy	Increase, tpy	Threshold*, tpy	Increase < Threshold?
CO	0	6.63	100	YES
NO _x	0	0.89	5	YES
SO ₂	0	0.16	40	YES
VOC	0	2.9	5	YES

*For NO_x and VOC, threshold limits are based on 30 TAC §116.150 for nonattainment area. The threshold limits for other pollutants are based on 40 CFR §52.21(b)(23).

3. TCEQ Received Date January 2, 2008, Issuance Date December 29, 2008, TCEQ Project No. 135428

Project Description

- A Added planned MSS for hazardous waste tanks (B1, B2, F2, F3, H1 and H2) and Tank T554 cleaning and degassing
- B Replaced the first electrostatic precipitator (ESP) in REGEN2 and refurbished the second ESP in REGEN2

Project Increase

The only project increases were VOC emissions from the two new EPNs for tank MSS. Two new emission points were added (MSS-HAZTK1 and MSS-HAZTK2) for tank MSS activity. There were no PM emissions from the affected equipment.

Table 9-3 Project Increase for NA Review

EPN	Description	Pollutant	Proposed rate, tpy	Baseline, tpy	Threshold, tpy	Increase < Threshold?
MSS-HAZTK1	Hazardous Waste Tanks (F2, F3) and T554, Planned MSS Purge	VOC	0.01	0	5	
MSS-HAZTK2	Hazardous Waste Tanks (B1, B2, H1 and H2), Planned MSS Purge	VOC	0.01	0	5	
Total		VOC	0.02	0	5	YES

As shown in Table 9-3, the project increase of 0.02 tpy was less than the threshold limit (5 tpy) for NA review. Therefore, this project did not trigger NA review. Since there were no PSD pollutants associated with this project, it didn't trigger PSD review either.

4. TCEQ Received Date December 27, 2006, Issuance Date April 5, 2007, TCEQ Project No. 126531

Project Description

- A Installed a new spent sulfuric acid tank (Tank No. 53)
- B Added new fittings (flanges and valves) associated with the installation of the new tank
- C Modified Special Condition 3 in current permit to increase hazardous waste tank truck depressurizations to 10 trucks/day for 1314 hours/year (550 trucks/year)
- D Increased the spent acid tank turnovers among Tanks 48, 49, 56 and 78 and include new Tank 53 turnovers
- E Added a new EPN for emissions due to tank MSS
- F Changed and added special conditions for hydrocarbon monitors
- G Added new chemicals to the "Approved Chemical List for Hazardous Waste Operations"

Project Increase

Only Items A to E need to be evaluated for project increase. Since the input to the acid-making process was changed, Unit No. 2 Stack (EPN 104) was affected by this project. Other affected EPNs were vapor combustor (EPN 120), vapor combustor 2 (EPN 170), TKINSPMSS1, TKINSPMSS2, and FUG-SA1.

For EPN 104, emissions increases caused by adding Tank 53 and increased turnovers are used as baseline. In order to simplify the analysis, baseline emissions for other EPNs are assumed to be zero, and the allowable rates are directly compared to the threshold limits. As shown in Table 9-5, none of the pollutants has a project increase greater than the threshold limit. Therefore, this permit amendment did not trigger PSD or NA review.

Table 9-4 Annual Emission Rates

EPN	Description	Pollutant	tpy
104	Regen No. 2 Stack	NO _x	0.350
		CO	0.054
		SO ₂	11.75
		H ₂ SO ₄	0.057
		PM/PM ₁₀ /PM _{2.5}	0.032
120	Vapor Combustor	Cl ₂	0.09
	(Startup, Shutdown, and	CO	0.27
	Maintenance 1,314 hours	HCl	0.04
	per rolling 12 months)	NO _x	0.32
		PM ₁₀	0.02
		SO ₂	0.01
		VOC	3.41
170	Vapor Combustor 2	CO	0.093
	(Start-up, Shutdown and	Cl ₂	0.03
	Maintenance 1,314 hours	HCl	0.12
	per rolling 12 months)	NO _x	0.011
		PM ₁₀	0.05
		SO ₂	0.028
		VOC	0.006
170	Vapor Combustor 2	CO	0.51
	Storage tanks	NO _x	0.32
	Inspection control option	SO ₂	0.01
	one	VOC	0.02
TKINSPMSS1	Tank 78 Planned MSS	CO	0.75
		NO _x	0.35
		SO ₂	0.09
		VOC	0.07
TKINSPMSS2	Tank 48, 49, 53, and 56	CO	0.4
	Planned MSS	NO _x	0.19
		SO ₂	0.01
		VOC	0.02
FUG-SA1	Spent acid process fugitive	H ₂ SO ₄	1.79
		SO ₂	0.37
		VOC	0.35

*For EPN 104, PM/PM₁₀/PM_{2.5} emissions were never authorized in the MAERT for this amendment. They are added here for retrospective PSD analysis.

Table 9-5 Project Increase for PSD and NA Review

Pollutant	Proposed, tpy	Baseline, tpy	Threshold*, tpy	Increase < Threshold?
CO	2.08	0	100	YES
NO _x	1.54	0	5	YES
SO ₂	12.27	0	40	YES
VOC	3.88	0	5	YES
H ₂ SO ₄	1.85	0	7	YES
PM/PM ₁₀ /PM _{2.5}	0.032	0	25/15/10	YES

*For NO_x and VOC, threshold limits are based on 30 TAC §116.150 for nonattainment area. The threshold limits for other pollutants are based on 40 CFR §52.21(b)(23).

5. TCEQ Received Date October 18, 2006, Issuance Date February 20, 2007, TCEQ Project No. 125360

Project Description

- A Installed a new acidulator
- B Authorized fugitive emissions associated with this new acidulator

Project Increase

Since the installation of the acidulator did not alter the parameters (e.g., production rate) for the acid-making process, it did not qualify for a physical change or change of method of operation for the acid-making process according to 30 TAC §116.12 (18)(A). Therefore, the acid-making process was not affected and associated Unit No. 2 Stack (EPN 104) was not modified. Also, there were no PM emissions associated with this EPN. The only project increase came from the fugitive emissions (EPN FE2) related to the components for the acidulator. Table 9-6 shows the analysis for FE2. To simplify the process, the baseline is assumed to be zero.

Table 9-6 Project Increase for PSD Review

Pollutant	Proposed, tpy	Baseline, tpy	Threshold, tpy	Increase < Threshold?
SO ₂	0.2	0	40	YES

As shown above, SO₂ did not have a project increase greater than the threshold limit. Therefore, this permit amendment did not trigger PSD review.

6. TCEQ Received Date February 7, 2006, Issuance Date April 5, 2006, TCEQ Project No. 120879

Project Description

Tank 78 used to send vent stream to caustic scrubber followed by vapor combustor (EPN 170). In this amendment, Rhodia rerouted the Tank 78 emission to furnace if the furnace operated normally.

Project Increase

Rerouting of Tank 78 emissions to the furnace affected the acid-making process. Therefore, the acid-making process was affected and associated Unit No. 2 Stack (EPN 104) was modified. The other affected facility was the vapor combustor 2 (EPN 170) for its normal and furnace MSS activities. For EPN 104, emission increases caused by rerouting Tank 78 emissions were used as baseline. To simplify the process, the baseline is assumed to be zero for EPN 170.

Table 9-7 Annual Emission Rates

EPN	Description	Pollutant	tpy
104*	Regen No. 2 Stack	NO _x	0.18
		CO	0.028
		SO ₂	6.12
		H ₂ SO ₄	0.030
		PM/PM ₁₀ /PM _{2.5}	0.017
170	Vapor Combustor 2 (Start-up, Shutdown and Maintenance 1,314 hours per rolling 12 months)	CO	0.56
		Cl ₂	0.03
		HCl	0.12
		NO _x	1.87
		PM ₁₀	0.05
		SO ₂	0.11
		VOC	0.69
170	Vapor Combustor 2 (Normal Operation)	CO	1.87
		NO _x	1.4
		PM ₁₀	0.07
		SO ₂	0.01
		VOC	0.05

*For EPN 104, PM/PM₁₀/PM_{2.5} emissions were never authorized in the MAERT for this amendment. They are added here for retrospective PSD analysis.

Table 9-8 Project Increase for PSD and NA Review

Pollutant	Proposed, tpy	Baseline, tpy	Threshold*, tpy	Increase < Threshold?
CO	2.46	0	100	YES
NO _x	3.45	0	5	YES
SO ₂	6.24	0	40	YES
VOC	0.74	0	5	YES
PM/PM ₁₀ /PM _{2.5}	0.137	0	25/15/10	YES

*For NO_x and VOC, threshold limits are based on 30 TAC §116.150 for nonattainment area. The threshold limits for other pollutants are based on 40 CFR §52.21(b)(23).

As shown above, project increase for each pollutant does not exceed its corresponding threshold limit. Therefore, this amendment did not trigger PSD or NA review.

7. TCEQ Received Date January 3, 2005, Issuance Date August 24, 2005, TCEQ Project No. 112876

Project Description

- A Authorized pollutants (HCl, Cl₂ and CO) that were never permitted for Regen No. 2 Stack (EPN 104).
- B Reconciled H₂SO₄ for Regen No. 2 Stack (EPN 104). This lowered the emission in permit.
- C Authorized pollutants (Cl₂, CO, HCl, NO_x, PM₁₀ and SO₂) that were never permitted during MSS for vapor combustor (EPN 120).

Project Increase

The only affected facilities that this amendment application were related to were EPN 104 and 120. Since no physical change was involved, pollutants that were already authorized do not need to be considered as project increases unless the rates were changed. Therefore, no projects were authorized as part of this amendment. Hence, no FNSR applicability.

Table 9-9 Annual Emission Rates

EPN	Description	Pollutant	tpy
104	Regen No. 2 Stack	CO	25
		Cl ₂	0.08
		H ₂ SO ₄	22.67
		HCl	1.23
120	Vapor Combustor	Cl ₂	0.09
	(Startup, Shutdown, and	CO	0.27
	Maintenance 1,314 hours	HCl	0.04
	per rolling 12 months)	NO _x	0.32
		PM ₁₀	0.02
		SO ₂	0.01

8. TCEQ Received Date September 4, 2003, Issuance Date October 21, 2004, TCEQ Project No. 100817

Project Description

- A Authorized new vapor combustor (EPN 120) to control vent streams from hazardous waste tanks if the furnace is down.
- B Authorized new vapor combustor 2 (EPN 170) to control vent streams from spent acid tanks if the furnace is down.
- C Authorized VOC emissions from Unit No. 2 Stack (EPN 104).
- D Included fugitive emissions (FE-12 to FE-14 and FUG-SA1 to FUG-SA4).

Project Increase

The additions of EPN 120 and EPN 170 were independent projects by themselves. The authorization of VOC from EPN 104 and addition of fugitive sources can be treated as one project. Since EPN 120, EPN 170 and fugitives were newly added, their baselines are zero. VOC from EPN 104 was not authorized before, its baseline is also zero.

Table 9-10 Annual Emission Rates

EPN	Description	Pollutant	tpy
120	Vapor Combustor	CO	3.33
	Standby	NO _x	3.96
		PM ₁₀	0.3
		SO ₂	0.02
		VOC	0.22
120	Vapor Combustor (maintenance)	VOC	3.29
170	Vapor Combustor 2	CO	1.87
	Normal	NO _x	1.4
		PM ₁₀	0.07
		SO ₂	0.52
		VOC	3.3
170	Vapor Combustor 2	SO ₂	0.02
	(maintenance)	VOC	0.14
104	Unit No.2 Stack	VOC	0.01
FE-12	Fugitives from HW Equipment	VOC	0.19
FE-13	Fugitives from HW Equipment	VOC	0.1
FE-14	Fugitives from HW Equipment	VOC	0.01
FUG-SA1	Spent Acid Process Fugitives	VOC	0.27
		SO ₂	0.31
		H ₂ SO ₄	1.33
FUG-SA2	Spent Acid Process Fugitives	VOC	0.06
		SO ₂	0.08
		H ₂ SO ₄	0.27
FUG-SA3	Spent Acid Process Fugitives	VOC	0.07
		SO ₂	0.18
		H ₂ SO ₄	0.11
FUG-SA4	Spent Acid Process Fugitives	VOC	0.29
		SO ₂	0.37
		H ₂ SO ₄	1.33

Table 9-11 Project Increase from EPN 120 for PSD and NA Review

Pollutant	Proposed, tpy	Baseline, tpy	Threshold*, tpy	Increase < Threshold?
CO	3.33	0	100	YES
NO _x	3.96	0	5	YES
PM ₁₀	0.3	0	15	YES
SO ₂	0.02	0	40	YES
VOC	3.51	0	5	YES

Table 9-12 Project Increase from EPN 170 for PSD and NA Review

Pollutant	Proposed, tpy	Baseline, tpy	Threshold*, tpy	Increase < Threshold?
CO	1.87	0	100	YES
NO _x	1.4	0	5	YES
PM ₁₀	0.07	0	15	YES
SO ₂	0.54	0	40	YES
VOC	3.44	0	5	YES

Table 9-13 Project Increase from EPN 104 and Fugitives for PSD and NA Review

Pollutant	Proposed, tpy	Baseline, tpy	Threshold*, tpy	Increase < Threshold?
VOC	1.0	0	5	YES
SO ₂	0.94	0	40	YES
H ₂ SO ₄	3.04	0	7	YES

*For NO_x and VOC, threshold limits are based on 30 TAC §116.150 for nonattainment area. The threshold limits for other pollutants are based on 40 CFR §52.21(b)(23).

As shown above, project increase for each pollutant does not exceed its corresponding threshold limit. Therefore, this amendment did not trigger PSD or NA review.

9. TCEQ Received Date September 1, 1994, Issuance Date June 28, 1995, TCEQ

Project No. 30032

Project Description

There were no projects authorized in this renewal.

Project Increase

This is not applicable.

10. TCEQ Received Date April 27, 1993, Possible Issuance Date November 4, 1993,

TCEQ Project No. 21867

Project Description

This was to incorporate three special conditions previously contained in Permit No. 4802A into Permit 4802. The Permit No. 4802A was voided.

Project Increase

No project increase due to the incorporation of Permit No. 4802A.

11. TCEQ Received Date unknown, Issuance Date April 22, 1985, TCEQ Project No. unknown

Project Description

Fugitive emissions (SO_3) associated with oleum unit was authorized.

Project Increase

The only project increase was SO_3 . The permit condition was 0.1 lb of SO_3 /day. This is equivalent to 0.02 tpy. Apparently, this did not trigger any PSD review.

12. TCEQ Received Date unknown, Possible Issuance Date July 1977, TCEQ Project No. unknown

Project Description

New furnace, new waste heat boiler, new converter, new "C" heat exchanger, oleum tower were added as a modernization project. The production rate was increased from 600 to 740 tons of acid/day. Meanwhile, Unit No. 1 was shutdown.

Project Increase

According to a letter dated September 23, 1976 from Rhodia (Stauffer Chemical Company at that time) to Mr. Bennett Stokes at EPA Region VI, this change did not qualify for modification. An excerpt of the letter is cited below:

This planned modernization of Unit No. 2 will return its capacity to 740 tons per day H_2SO_4 and its mass emission rate will be increased to 18 tons per day of SO_2 . Although resulting in increased emissions from this Unit, it is Stauffer's position that the planned changes to Unit No. 2 will not qualify it as a modification as defined in the EPA new source regulations because of the application of 40 CFR 60.14(d) - "the bubble concept". This section of the new source regulations applies to this situation since Unit No. 1, which now emits 3.5 tons per day of SO_2 , is being shutdown while Unit No. 2 emissions will increase by only 3 tons per day; an amount which is less than the present emissions of the Unit to be shutdown.

Therefore, there was no project increase. This project did not trigger PSD or NA review.

Summary

Since the historical FNSR analysis conducted as part of this amendment application did not trigger any of the PSD or NANSR. As a result, this site should be able to utilize a baseline for $\text{PM}_{10}/\text{PM}_{2.5}$ emissions for both NSR applicability analysis and impact review (dispersion modeling analysis).

10. PERMIT FEE AND P.E. CERTIFICATION

To meet the requirements of Title 30 TAC §116.141, a Certificate of Estimated Capital Cost and Fee Verification (Table 30) is included with this permit amendment application. Because this project has an estimated capital cost of \$5,000,000, and is subjected to PSD review, Rhodia will submit the permit application fee of \$50,000.



Texas Commission on Environmental Quality
Table 30
Estimated Capital Cost and Fee Verification

Include estimated cost of the equipment and services that would normally be capitalized according to standard and generally accepted corporate financing and accounting procedures. Tables, checklists, and guidance documents pertaining to air quality permits are available from the Texas Commission on Environmental Quality, Air Permits Division Web site at www.tceq.state.tx.us/nav/permits/air_permits.html.

I. DIRECT COSTS [30 TAC § 116.141(c)(1)]	Estimated Capital Cost
A. A process and control equipment not previously owned by the applicant and not currently authorized under this chapter	\$ 300,000
B. Auxiliary equipment, including exhaust hoods, ducting, fans, pumps, piping, conveyors, stacks, storage tanks, waste disposal facilities, and air pollution control equipment specifically needed to meet permit and regulation requirements	\$ 1,750,000
C. Freight charges	\$ 50,000
D. Site preparation, including demolition, construction of fences, outdoor lighting, road and parking areas	\$ 200,000
E. Installation, including foundations, erection of supporting structures, enclosures or weather protection, insulation and painting, utilities and connections, process integration, and process control equipment	\$ 1,000,000
F. Auxiliary buildings, including materials storage, employee facilities, and changes to existing structures	\$ 0
G. Ambient air monitoring network	\$ 0
II. INDIRECT COSTS [30 TAC § 116.141(c)(2)]	Estimated Capital Cost
A. Final engineering design and supervision, and administrative overhead	\$ 1,200,000
B. Construction expense, including construction liaison, securing local building permits, insurance, temporary construction facilities, and construction clean-up	\$ 500,000
C. Contractor's fee and overhead	\$
TOTAL ESTIMATED CAPITAL COST	\$ 5,000,000

I certify that the total estimated capital cost of the project as defined in 30 TAC § 116.141 is equal to or less than the above figure. I further state that I have read and understand Texas Water Code § 7.179, which defines **CRIMINAL OFFENSES** for certain violations, including intentionally or knowingly making, or causing to be made, false material statements or representations.

Company Name: Rhodia Inc.

Company Representative Name (please print): William McConnell Title: Plant Manager

Company Representative Signature: *William McConnell*

Estimated Capital Cost	Permit Application Fee	PSD/Nonattainment Application Fee
Less than \$300,000	\$900 (minimum fee)	\$3,000 (minimum fee)
\$300,000 to \$25,000,000	0.30% of capital cost	\$50,000.00
\$300,000 to \$7,500,000		1.0% of capital cost
Greater than \$25,000,000	\$75,000 (maximum fee)	
Greater than \$7,500,000		\$75,000 (maximum fee)

PERMIT APPLICATION FEE (from table above) = \$ 50,000.00 Date: 5/24/2011

Per 30 TAC 116.110(f), applications with a project capital cost greater than \$2,000,000 must be submitted under seal of a Texas licensed professional engineer. Therefore, Rhodia is submitting this application under the seal of Wei Liu, P.E.

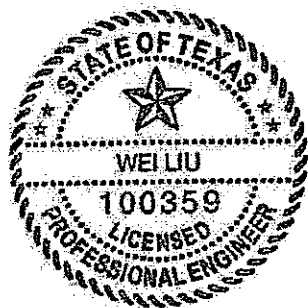
PROFESSIONAL ENGINEER CERTIFICATION

Based on the information provided by Rhodia, Inc., I directly supervised the engineering work products contained in the Emission Calculation (Section 7 and Appendix A) and the Best Available Control Technology (Section 12).

To the best of my knowledge, the representations made in this document are true and accurate. By affixing my seal below, I submit that the engineering work and calculations performed in the above listed sections were either performed by myself or under my direct supervision, as defined in Section 131.18 of the Texas Engineering Practice Act and in compliance with Title 30 of the Texas Administrative Code, Chapter 116, Section 116.110(f).

Wei Liu May 27, 2011
Signature Date

Wei Liu, Ph.D. Sr. Consultant Trinity Consultants, Firm No. 5764
Name Title Affiliation



11. MATERIAL BALANCE

TABLE 2 MATERIAL BALANCE

TABLE 2

MATERIAL BALANCE

This material balance table is used to quantify possible emissions of air contaminants and special emphasis should be placed on potential air contaminants, for example: If feed contains sulfur, show distribution to all products. Please relate each material (or group of materials) listed to its respective location in the process flow diagram by assigning point numbers (taken from the flow diagram) to each material.

LIST EVERY MATERIAL INVOLVED IN EACH OF THE FOLLOWING GROUPS	Point No. from Flow Diagram	Process Rate (lbs/hr or SCFM) standard conditions: 70 F 14.7 PSIA. Check appropriate column at right for each process.	Measurement	Estimation	Calculation
1. Raw Materials - Input Spent Acid Hazardous Waste Sulfur		57,300,000 gallons/year 6,202,000 gallons/year 13,140,000 gallons/year		X X X	
2. Fuels - Input Natural Gas	Preheater EPN 120 EPN 170	Maximum 810 SCFM for all three		X	
Products & By-Products - Output H ₂ SO ₄		95833.3 lbs/hr (1,150 tons/day)		X	
4. Solid Wastes - Output					
5. Liquid Wastes - Output					
6. Airborne Waste (Solid) - Output		See Table 1(a)			
7. Airborne Wastes (Gaseous) - Output		See Table 1(a)			

12. STATE BEST AVAILABLE CONTROL TECHNOLOGY

Best available control technology (BACT) requirements must be met for all new or modified sources in the permit application. Based on 30 TAC §116.111, Rhodia must demonstrate that the equipment will utilize BACT, with consideration given to the technical practicability and economic reasonableness of reducing or eliminating the emissions from the equipment. While the Catalyst Screening and Wet Scrubber (Sections 12.1 and 12.2) conform to State BACT, the Mist Eliminator will need to meet the Federal BACT analysis as demonstrated in Section 12.3.

12.1 CATALYST SCREENING

The catalyst screening is controlled by a bag filter. The bag filter has an outlet particulate loading of 0.01 grain/scf. This meets the current state BACT requirements.

12.2 WET SCRUBBER

The SO₂ laden gas leaving the sulfuric acid plant absorption tower will be removed by sodium salt scrubbing in the newly proposed two-stage wet scrubber. Rhodia currently has mist eliminators at the outlet of Regen 2 process and will continue to utilize mist eliminators to minimize sulfuric acid mist emissions after the new scrubber is installed. The scrubber achieves an SO₂ removal efficiency of at least 95%.

The system is designed to remove sufficient sulfur dioxide from the sulfuric acid plant tail gas to meet sulfuric acid plant emission regulations. The unit is highly flexible and permits control of SO₂ to meet emissions requirements even during a cold start-up or upset. Rhodia currently has an SO₂ continuous emission monitoring system (CEMS) on the Unit No. 2 Stack, and there will be a SO₂ CEMS on the outlet of the scrubber to ensure compliance.

Installation of spare circulation pump ensures 100% on-stream time. The system operation parameters are monitored to meet the reliability and flexibility requirements by the TCEQ.

In addition, Title 40 Code of Federal Regulations Part 60, Subpart H (Standards of Performance for Sulfuric Acid Plants), §60.82 requires that no owner or operator subject to the provisions of the subpart shall cause to be discharged into the atmosphere from any affected facility any gases which contain sulfur dioxide in excess of 2 kg per metric ton of acid produced (4 lb per ton). Rhodia will emit 1.8 lb SO₂/ton acid produced on an annual basis. The emission rate from the new scrubber will meet and exceed the NSPS requirements.

12.3 PSD BACT FOR MIST ELIMINATOR (SULFURIC ACID)

Since acid mist triggers the PSD review, the Mist Eliminator has to conform to the Federal BACT provisions as codified in TCEQ chapter 116. Sulfuric acid triggers PSD review for this application. Therefore, the BACT analysis for sulfuric acid should follow the top-down EPA 5-step approach.

A search of BACT for sulfuric acid mist (H_2SO_4) control was performed from TCEQ guidance documents and EPA's RACT/BACT/LAER Clearinghouse (RBLC) for the last 10 years (May 2001 to May 2011).

Step 1 Available BACT Technologies

The RBLC results are summarized in Appendix D for the sulfuric acid industry (RBLC process ID 62.015). As it shows, the BACT for H_2SO_4 control includes mist eliminators (also known as candles or filter media), wet electrostatic precipitators, condensers and wet scrubbers.

Step 2 Elimination of Technically Infeasible Options

All techniques are technically feasible.

Step 3 Rank Remaining Control Technologies by Effectiveness

All control technologies are ranked from the most efficient to the least efficient order.

Table 12-1 Rank of Control by Effectiveness

Rank	Description	Efficiency, %
1	Brink mist eliminators	99.9%
2	mist eliminators, filter media	99%
3	Wet ESP, condensers, wet scrubbers	unknown

Step 4 Evaluation of Most Effective Control

Apparently, the most efficient control will be the Brink mist eliminators. Mist eliminators or filter media are just different names for the mist eliminators. Most of them can achieve 99% control efficiency.

Step 5 Selection of BACT

Rhodia has the Brink mist eliminator in place.

All mist eliminators are using filter media to capture acid mists. The major differences are different materials and equipment configuration. The emission rate of acid mist ranges from 0.1 lb/ton acid produced to 0.15 lb/ton acid produced. Most of the applications utilized BACT-PSD analysis. Comparing to different mist eliminators, Rhodia's Brink eliminator is one of the devices with high efficiency.

Rhodia currently has a Type HE (high efficiency) fiberglass mist eliminator as an add-on device for acid mist control. Based on Brownian diffusion mechanism, droplets of sulfuric acid mist are trapped in fine collecting fibers and coarse re-entrainment fibers. The filter media is engineered chemical-resistant fiber. Therefore, it can provide durability for the mist eliminator. Test results showed that this mist eliminator has at least 99.9% removal efficiency for particle size less than 1 micron.

Rhodia estimates that the acid mist will be below 0.10 lb acid mist/ton acid produced. This will meet the level of control required by NSPS Subpart H.

13. GENERAL APPLICATION REQUIREMENTS

According to the instructions for filing an Air Quality Permit PI-1 form, the permit amendment application must address the General Application Requirements, as specified in 30 TAC §116.111. The requirements are listed and addressed in the following section.

§116.111. General Application.

In order to be granted a permit, amendment, or special permit amendment, the application must include:

(1) a completed Form PI-1 General Application signed by an authorized representative of the applicant. All additional support information specified on the form must be provided before the application is complete;

A signed Form PI-1 is included in this report. Additional supporting information, as specified on the application form, is included in various other sections of this report.

(2) information which demonstrates that all of the following are met.

(2)(A) Protection of public health and welfare.

(2)(A)(i) The emissions from the proposed facility will comply with all rules and regulations of the commission and with the intent of the TCAA, including protection of the health and physical property of the people.

Operations at Rhodia's Sulfuric Acid Regeneration Unit No. 2 (Regen 2) are consistent with the goal of protecting the public health, welfare, and physical property of the people. This is demonstrated by the Regen 2's compliance with all air quality rules in the Texas Administrative Code, as outlined below.

General Rules: Regen 2 will be operated in accordance with the General Rules relating to circumvention, nuisance, traffic hazard, notification and recordkeeping requirements for major emission events and for startup/shutdown/maintenance, sampling/sampling port/sampling procedures, emissions inventory requirements, compliance with Environmental Protection Agency Standards, the National Primary and Secondary Air Quality Standards, inspection fees, emissions fees, and all other applicable General Rules.

Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter: The operation of Regen 2 may result in occasional visible emissions but not in excess of the opacity limits specified in 30 TAC §111.111. The facility will comply with the allowable particulate matter (PM) emission rate specified in 30 TAC §111.151.

Chapter 112 - Control of Air Pollution from Sulfur Compounds: The Sulfuric Acid Regeneration Unit No. 2 will comply with all requirements of Chapter 112.

Chapter 113 – Control of Air Pollution from Toxic Materials: At this time, Chapter 113 regulates the emission of radionuclides (40 CFR 61, Subpart R), municipal solid waste landfills, hospital/medical/infectious waste incinerators, and hazardous air pollutants for source categories (40 CFR 63). There will be no emissions of radionuclides, and the facility is subject to 40 CFR Part 63, Subpart G, XX and GGG. All of these are authorized in this permit (Permit 4802) and pending Title V Permit O-3049.

Chapter 114 – Control of Air Pollution from Motor Vehicles: All motor vehicles owned or operated by the facility will comply with the applicable provisions of this regulation including maintenance and operation of air pollution control systems or devices, inspection requirements, equipment evaluation procedures for vehicle exhaust gas analyzers, and use of oxygenated fuels.

Chapter 115 – Control of Air Pollution from Volatile Organic Compounds (VOC): The Houston Plant is located in Harris County (part of the Houston/Galveston ozone nonattainment area). Although some of the facilities (such as tanks) are subject to 30 TAC 115, the acid-making process does not belong to any particular process as defined through Division 1 to 6 of 30 TAC 115. The Sulfuric Acid Regeneration Unit No. 2 is not subject to 30 TAC Chapter 115.

Chapter 117– Control of Air Pollution from Nitrogen Compounds: The Houston Plant is located in Harris County, which is designated as a severe nonattainment area for ozone. The Sulfuric Acid Regeneration Unit No. 2 is not subject to Chapter 117 because sulfuric acid regeneration units are exempt per 30 TAC §117.303(a)(4).

Chapter 118– Control of Air Pollution Episodes: The facility will be operated in compliance with the rules relating to generalized and localized air pollution episodes.

Chapter 122– Federal Operating Permits: Rhodia submitted an initial application for Title V operating permit. That application (Permit O-3049) is currently under review. Meanwhile, Rhodia complies with the draft Title V Permit (O-3049) for its Houston Plant.

(2)(A)(ii) For issuance of a permit for construction or modification of any facility within 3,000 feet of an elementary, junior high/middle, or senior high school, the commission shall consider any possible adverse short-term or long-term side effects that an air contaminant or nuisance odor from the facility may have on the individuals attending the school(s).

Rhodia has conducted air dispersion modeling analysis for H₂SO₄, PM₁₀, and PM_{2.5} in this application. The discussions and results can be found in Section 14.

(2)(B) Measurement of emissions. The proposed facility will have provisions for measuring the emission of significant air contaminants as determined by the executive director. This may include the installation of sampling ports on exhaust stacks and construction of sampling platforms in accordance with guidelines in the "Texas Natural Resource Conservation Commission (TNRCC) Sampling Procedures Manual."

Emissions from any source addressed in the application will be sampled upon request of the Executive Director of the TCEQ, and sampling ports, etc. will be installed as needed.

(2)(C) Best available control technology (BACT). The proposed facility will utilize BACT, with consideration given to the technical practicability and economic reasonableness of reducing or eliminating the emissions from the facility.

Please refer to Section 12 of this application for the BACT analysis of affected equipment.

(2)(D) New Source Performance Standards (NSPS). The emissions from the proposed facility will meet the requirements of any applicable NSPS as listed under Title 40 Code of Federal Regulations (CFR) Part 60, promulgated by the EPA under FCAA, §111, as amended.

The Sulfuric Acid Regeneration Unit No. 2 will be subject to 40 CFR 60 Subparts A, Cd, and H.
Subpart A: the unit will comply with all reporting requirements.
Subpart Cd: the unit will comply with requirements related to H₂SO₄.
Subpart H: the unit will comply with requirements related to SO₂, PM and H₂SO₄

(2)(E) National Emission Standards for Hazardous Air Pollutants (NESHAP). The emissions from the proposed facility will meet the requirements of any applicable NESHAP, as listed under 40 CFR Part 61, promulgated by EPA under FCAA, §112, as amended.

The Sulfuric Acid Regeneration Unit No. 2 processes hazardous wastes. Hence, it is subject to 40 CFR 61 Subpart FF.

(2)(F) NESHAP for source categories. The emissions from the proposed facility will meet the requirements of any applicable maximum achievable control technology standard as listed under 40 CFR Part 63, promulgated by the EPA under FCAA, §112 or as listed under Chapter 113, Subchapter C of this title (relating to National Emissions Standards for Hazardous Air Pollutants for Source Categories (FCAA §112, 40 CFR 63)).

The Sulfuric Acid Regeneration Unit No. 2 processes hazardous wastes. Hence, it is subject to 40 CFR 63 Subparts G, XX and GGG.

(2)(G) Performance demonstration. The proposed facility will achieve the performance specified in the permit application. The applicant may be required to submit additional engineering data after a permit has been issued in order to demonstrate further that the proposed facility will achieve the performance specified in the permit application. In addition, dispersion modeling, monitoring, or stack testing may be required.

The facility will perform as represented in the permit application. The production rates upon which emission calculations are based will not be exceeded. Control devices will be maintained as necessary to achieve the specified emission reductions.

(2)(H) Nonattainment review. If the proposed facility is located in a nonattainment area, it shall comply with all applicable requirements in this chapter concerning nonattainment review.

Regen 2 is located in a severe nonattainment area for ozone. Emissions of volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated as precursors to ozone formation. In a severe nonattainment area, a major stationary source is defined as having VOC or NO_x emissions equal to or greater than 25 tons per year. As shown in Section 8.3, project increase for NO_x and VOC is less than 5 tpy. Therefore, this project is not subject to NA review.

(2)(I) Prevention of Significant Deterioration (PSD) review. If the proposed facility is located in an attainment area, it shall comply with all applicable requirements in this chapter concerning PSD review.

The Sulfuric Acid Regeneration Unit No. 2 at Rhodia's Houston Plant is operating in an attainment area for SO₂, CO, PM, PM_{10/2.5}, GHG and lead. As shown in Section 8.2, the project increases of SO₂, PM, PM_{10/2.5}, CO, and GHG emissions are less than their corresponding significant thresholds. However, acid mist (H₂SO₄) is subject to PSD review.

(2)(J) Air dispersion modeling. Computerized air dispersion modeling may be required by the executive director to determine air quality impacts from a proposed new facility or source modification.

Rhodia has conducted dispersion modeling for H₂SO₄, PM₁₀, and PM_{2.5} in this application. The discussions and results can be found in Section 14.

(2)(K) Hazardous air pollutants. Affected sources (as defined in §116.15(1) of this title (relating to Section 112(g) Definitions)) for hazardous air pollutants shall comply with all applicable requirements under Subchapter C of this chapter (relating to Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources (FCAA, §112(g), 40 CFR Part 63)).

No facility in this application meets the definition of affected source defined in §116.15(1). Therefore, the requirement does not apply.

(L) Mass cap and trade allowances. If subject to Chapter 101, Subchapter H, Division 3, of this title (relating to Mass Emissions Cap and Trade Program), the proposed facility, group of facilities, or account must obtain allowances to operate.

The Houston Plant is located in the Houston/Galveston Nonattainment area. The site is subject to the Mass Emissions Cap and Trade Program due to other NO_x generating equipment. However, the Sulfuric Acid Regeneration Unit No. 2 is not subject to this program since it is exempt from 30 TAC Chapter 117.

(b) In order to be granted a permit, amendment, or special permit amendment, the owner or operator must comply with the following notice requirements.

(1) Applications declared administratively complete before September 1, 1999, are subject to the requirements of Chapter 116, Subchapter B, Division 3 (relating to Public Notification and Comment Procedures).

Not applicable. The permit amendment application is being sent to the TCEQ after September 1999.

(2) Applications declared administratively complete on or after September 1, 1999, are subject to the requirements of Chapter 39 of this title (relating to Public Notice) and Chapter 55 of this title (relating to Request for Reconsideration and Contested Case Hearings; Public Comment). Upon request by the owner or operator of a facility which previously has received a permit or special permit from the commission, the executive director or designated representative may exempt the relocation of such facility from the provisions in Chapter 39 of this title if there is no indication that the operation of the facility at the proposed new location will significantly affect ambient air quality and no indication that operation of the facility at the proposed new location will cause a condition of air pollution.

According to TCEQ guidance, based on the emission rate increases associated with this project, public notice may be required. Rhodia will perform public notice upon request from the TCEQ as required. Additional information regarding public notice is provided on the PI-1 form of this application.

14. AIR QUALITY ANALYSIS

14.1 PSD ANALYSIS

Sulfuric acid mist (H_2SO_4) from Regen 2 Stack (EPN 104) triggers PSD review. Therefore, PSD modeling analysis is required. Unlike the criteria pollutants, there is no National Ambient Air Quality Standards (NAAQS) for sulfuric acid. 30 TAC §112.41 defines H_2SO_4 concentration limits for different averaging periods; therefore, air quality analysis for H_2SO_4 needs to comply with 30 TAC §112.41.

Table 14-1 30 TAC §112.41 Standards for H_2SO_4

Period	Concentration, $\mu g/m^3$	Details
Anytime	100	Never exceeds
1-hr	50	one-hour period of time more than once during any consecutive 24-hour period
24-hr	15	Never exceeds

An air dispersion modeling analysis is performed for the project related emissions increases. The modeled emission rates and associated source parameters are summarized in Table F-1 in Appendix F. The modeling result for the H_2SO_4 is shown in Tables 14-2.

14.2 STATE ANALYSIS

A State NAAQS air quality dispersion modeling analysis is conducted to evaluate PM_{10} and $PM_{2.5}$ emissions from the Houston Plant. The techniques used in the air quality dispersion modeling analysis are consistent with current TCEQ and U.S. EPA modeling procedures, as discussed in Section 14.^{1,2}

The first step in the analysis is to determine whether the specific project's emissions may have a "significant" impact. If there is no significant impact, the analysis is complete and no further review is required. Otherwise, a more comprehensive modeling study considering other sources of emissions may be required. In the Significance Analysis, the proposed emissions increases of PM_{10} and $PM_{2.5}$ related to the project from the Houston Plant were evaluated to determine whether they have the potential for a significant impact upon the area surrounding the facility. The modeled emission rates and associated source parameters are shown in Table F-1 of Appendix F. Please note that any give time, only one of the emission source between EPN 104 and EPN CATSCNR2 will be operating. Therefore, modeling was performed for two scenarios using source group option in AERMOD.

¹ Code of Federal Regulations, Title 40—Protection of Environment, Part 51, Appendix W, accessed at www.bna.com.

² TCEQ, *Air Quality Modeling Guidelines*, RG-25 (Revised), February 1999.

Per TCEQ modeling guidance, all modeled impacts are reported as the highest first high (H1H) modeled concentration.³ Since there are no modeling significance levels (MSLs) established for PM_{2.5}, the strictest U.S. EPA proposed values of 1.2 µg/m³ and 0.3 µg/m³ are used to compare with the modeled ground-level concentrations for PM_{2.5} 24-hour and annual averaging periods, respectively.⁴ The Significance Analysis determines if a Full Impact Analysis is required. Based on the results of the Significance Analysis, a Full Impact Analysis is not required for this air dispersion modeling analysis.

The modeling results for the PM₁₀ and PM_{2.5} Significance Analysis are shown in Tables 14-3.

14.3 TERRAIN AND LAND USE

The terrain is flat for the site. The latest National Elevation Dataset (NED) near the site is obtained from U.S. Geological Survey (USGS) for determining the elevations. The simple Auer method is used to determine the land use. As shown in Appendix E, more than 70% of the land is in red or white (for industrial sites) area, the land use can be classified as urban.

14.4 SURFACE ROUGHNESS

The terrain is flat for the site. The latest National Elevation Dataset (NED) for Southeast Texas (texas_se_NLCD_092800_flat.bin) is obtained from U.S. Geological Survey (USGS) for determining the elevations. The EPA's AERSURFACE software is used to calculate the albedo, Bowen ratio and surface roughness length surrounding the plant. To be conservative, all possible conditions for surface moisture (average, wet and dry) are run. Regardless of the options, each run gives an average roughness of 0.375 meter (Appendix E). Therefore, the roughness is medium.

14.5 AERMOD MODEL

The AERMOD model (version 09292) is used in conducting the air modeling analysis for the Houston Plant to estimate the maximum concentration at the property line and surrounding receptors.

In this analysis, air dispersion modeling analysis is performed using the regulatory default options, which include stack heights adjusted for stack-tip downwash, buoyancy-induced dispersion, and final plume rise. Ground-level concentrations occurring during "calm" wind conditions are calculated by the model using the calm processing feature. Regulatory default values for wind profile exponents and vertical potential temperature gradients are used since representative on-site meteorological data was not utilized. As per U.S. EPA requirements, direction-specific building dimensions are used in the downwash algorithms.

³ TCEQ, *Air Quality Modeling Guidelines*, RG-25 (Revised), February 1999.

⁴ *Prevention of Significant Deterioration (PSD) for Particulate Matter Less Than 2.5 Micrometers (PM_{2.5})-Increments, Significant Impact Levels (SILs) and Significant Monitoring Concentration (SMC)*; Federal Register, Vol. 72, No. 183, 54112, September 21, 2007.

14.6 RECEPTOR GRIDS

In the air dispersion modeling analysis, ground-level concentrations are calculated within four receptor grids. These four grids cover a region extending at least 10 km from all edges of the Houston Plant property line. Receptor grids near the modeled facility require closer spacing to ensure the highest concentration is captured. In most situations, the maximum concentrations are found on or near a facility's property line. For this dispersion modeling analysis, the receptor grids are defined as follows:

1. The "property line grid" is a discrete receptor grid with the receptors spaced at 25-m intervals along the property line;
2. The "tight grid" contains 25-m spaced receptors extending at least 300 m from the property line exclusive of the receptors within the property line;
3. The "fine grid" contains 100-m spaced receptors extending at least 1 km from the property line exclusive of the receptors in the tight grid;
4. The "medium grid" contains 500-meter spaced receptors extending 5 km from the property line exclusive of receptors in the fine grid; and
5. The "coarse grid" contains 1,000-meter spaced receptors extending 10 km from the property line exclusive of receptors in the medium grid.

14.7 METEOROLOGICAL DATA

Per TCEQ guidance for sources located in Harris County, the dispersion modeling analysis uses preprocessed meteorological data based on surface measurements made at the Houston International Airport Station (National Weather Service (NWS) station number 12960) and upper air measurements made at Lake Charles, Louisiana (NWS station number 03937).

Pre-processed meteorological files obtained from the TCEQ allow the choice of various roughness lengths (i.e., low, medium, and high) based on the land use surrounding the facility under evaluation. As discussed in Section 14.4, the average roughness based on AERSURFACE is 0.375 meter. Therefore, the TCEQ meteorological files from Year 1987 through 1991 containing medium surface roughness parameters for Harris County are used in the modeling analysis.

14.8 DOWNWASH

The emission source is evaluated in terms of its proximity to nearby structures. The purpose of this evaluation is to determine if stack discharges could be entrained in the turbulent wakes of these structures. Wind blowing around a building creates zones of turbulence that are greater than if the building was absent.

Direction-specific building dimensions and the dominant downwash structure parameters used as inputs to the dispersion models are determined using the BREEZE-WAKE/BPIP software, developed by Trinity Consultants, Inc. This software incorporates the algorithms of the U.S. EPA-sanctioned

Building Profile Input Program with PRIME enhancement (BPIP-PRIME), version 04274. BPIP-PRIME is designed to incorporate the concepts and procedures expressed in the GEP Technical Support document, the Building Downwash Guidance document, and other related documents.

The output from the BPIP-PRIME downwash analysis lists the structures' names and dimensions and the emission unit locations and heights. In addition, the output contains a summary of the dominant structure for each emission unit (considering all wind directions) and the actual building height and projected widths for all wind directions. This information is then incorporated into the data files for the AERMOD model. The Houston Plant modeled downwash structure heights for each structure that is considered in the downwash analysis are proved in Table F-2 in Appendix F of this report.

14.9 URBAN OPTION

In AERMOD setup, the land-use has considered the fact that the Houston Plant is located in a relatively urban area. The default roughness of 1 is used for AERMOD.

In addition, the population of this area is determined based on U.S. Census Bureau latest statistics (Year 2001). The population density of Houston is 3,371.7 people per square mile (See Appendix E). An area with 3 miles (5 km) radius is 28.26 miles². This gives 95,284 people.

14.10 MODELED SOURCES EMISSIONS AND PARAMETERS

The modeled source emissions and associated parameters related to the sulfuric acid, PM₁₀ and PM_{2.5} emission increases related to this project are provided in Table F-1 of Appendix F.

14.11 MODELING RESULTS

The modeling results for the H₂SO₄ are shown in Tables 14-2. As shown in Table 14-2, predicted concentrations for 1-hour and 24-hour averaging periods are less than the corresponding standards. At any time, there is no concentration higher than 100 µg/m³. Therefore, compliance demonstration is complete for H₂SO₄.

The modeling results for the PM₁₀ and PM_{2.5} Significance Analysis are shown in Tables 14-3. As can be seen in Table 14-3, the GLC_{max} is less than the corresponding MSLs. Therefore, no further evaluation is required for PM₁₀ (24-hour averaging period) and PM_{2.5} (24-hour and annual averaging periods) for the State NAAQS Analysis.

Table 14-2. H₂SO₄ Modeling Results

Pollutant	Averaging Period	Met Year	Maximum (H1H) Modeled Concentration (µg/m ³)	Standard (µg/m ³)	H1H < Standard
H ₂ SO ₄	1-hour	1987	1.35	50	Yes
	24-hour		0.42	15	Yes
	1-hour	1988	1.25	50	Yes
	24-hour		0.38	15	Yes
	1-hour	1989	1.35	50	Yes
	24-hour		0.36	15	Yes
	1-hour	1990	1.30	50	Yes
	24-hour		0.40	15	Yes
	1-hour	1991	1.32	50	Yes
	24-hour		0.38	15	Yes

Table 14-3. PM₁₀ and PM_{2.5} Significance Modeling Analysis Results

Pollutant	Averaging Period	Met Year	Source Group	Maximum (H1H) Modeled Concentration (µg/m³)	SIL (µg/m³)	H1H < SIL	
PM ₁₀	24-hour	1988	EPN104	0.88	5	Yes	
			CATSCNR2	0.10		Yes	
PM _{2.5}	24-hour		EPN104	0.88	1.2	Yes	
			CATSCNR2	0.10		Yes	
	Annual		EPN104	0.15	0.3	Yes	
			CATSCNR2	0.02		Yes	

15. ADDITIONAL IMPACT ANALYSIS

15.1 GROWTH

Since this project will only have moderate modification or construction, it will not have any associated emissions with other industrial, commercial or residential sources. Therefore, there will be no growth related to this project. Additional air emissions are not expected.

15.2 SOIL AND VEGETATION

The site and its surrounding area is a mixture of well-developed residential and industrial area. There is no agricultural land or important vegetation. Hence, the impact on soil and vegetation should be negligible.

15.3 VISIBILITY IMPAIRMENT

For Class II areas, Rhodia will comply with the visibility and opacity requirements of 30 TAC Chapter 111. Details of the compliance procedures will be in the Title V permit (application pending approval).

For Class I areas, the EPA has a modeling guidance of "*Workbook for Plume Visual Impact Screening and Analysis* (EPA, 1992c)". However, a level-1 screening modeling was not performed based on the reasons listed below:

1. The VISCREEN model has a regulatory application limitation of 50 km.
2. The site is about 528 km from the nearest Class I area (Caney Creek Wilderness, Arkansas). This is much bigger than the 100 km requirement.

Hence, the project will not pose any visual impairment for Class I areas.

16. AIR QUALITY RELATED VALUES

The Federal Land Managers (FLM) is responsible to manage Class I areas. FLM also has an affirmative responsibility to protect the air quality related values (AQRV) for these areas. A PSD application needs to get an approval or a waiver of AQRV analysis from a FLM division that is in charge of a particular Class I area.

The nearest Class I area to the Houston Plant is the Caney Creek Wilderness, Arkansas. On behalf of Rhodia, Trinity will submit a request to FLM to waive the detailed AQRV analysis.

APPENDIX A

EMISSION CALCULATIONS

Parameters:

Regen 2 Sulfuric Acid Production Rate: 1,150 tons/day [1]
 Annual Hours of Operation: 8,760 hr/yr

NOx Emissions

NOx Concentration: 96.8 ppmv (for 1-hour averaging)
 36.8 ppmv (for annual averaging)
 Exhaust Flow Rate: 55,145 acfm [2]
 Exhaust Temperature: 549 R [2]
 Exhaust Pressure: 1.0123 atm [3]
 Ideal Gas Constant: 0.73024 ft³-atm/(lbmole-R)

HCl and Cl₂ Emissions

Feed rate of chlorinated materials to furnace: 502.8 lb Cl/hr [4]
 Cl₂ emissions ratio: 14.706 lb HCl/lb Cl₂ [5]
 HCl removal efficiency: 99.969% [5]

CO₂ Emissions

Average vol.% 8%
 Maximum vol.% 10%
 Current production rate 969 tons of acid/day

Emission Factors:

Pollutant	Emission Factor	Units	Emission Factor Reference
H ₂ SO ₄ (acid mist)	0.15	lb mist/ton acid, Hourly	[6]
H ₂ SO ₄ (acid mist)	0.1	lb mist/ton acid, Annual	[7]
SO ₂	3	lb SO ₂ /ton acid,	[7]
SO ₂	1.8	lb SO ₂ /ton acid,	[7]

Emissions (per unit):

Pollutant	Max. Hourly Emissions lb/hr	Annual Emissions ton/yr	
PM	4.01	12.47	[8]
PM ₁₀	4.01	12.47	[8]
PM _{2.5}	4.01	12.47	[8]
H ₂ SO ₄	7.19	20.99	
CO ₂ -e	43,627.01	152,869.03	[9]
SO ₂	143.75	377.78	
NOx	37.20	61.95	[10]
HCl	0.16	0.70	
Cl ₂	0.011	0.048	

[1] Data provided by Rhodia.

[2] Based on data provided by Rhodia in an email dated 5/11/2011.

[3] Based on stack testing data from other Rhodia plants as provided in the 2006 Houston Plant permit 4802 amendment.

[4] From hazardous waste permit HW50095 as provided in the 2006 Houston Plant permit 4802 amendment.

[5] Based on furnace test data provided by Rhodia in the 2006 Houston Plant permit 4802 amendment.

[6] Based on EPA BACT emission rate for lb mist/ton acid produced.

[7] Emission factors are based on estimations provided by Rhodia.

[8] Based on February 2011 stack testing data and acid production rate from Unit 2, Baton Rouge Rhodia plant.

[9] Based on RCRA test conducted in October 2010, ideal gas law and ratio of proposed/current acid production.

[10] Emission rates are calculated based on ideal gas law.

Sample Calculations:

SO₂ Maximum Hourly Emissions

$$\frac{3.00 \text{ lb SO}_2}{\text{ton acid}} \times \frac{1,150 \text{ tons acid}}{\text{day}} \times \frac{1 \text{ day}}{24 \text{ hr}} = 143.75 \text{ lb/hr}$$

SO₂ Annual Emissions

$$\frac{1.80 \text{ lb SO}_2}{\text{ton acid}} \times \frac{1,150 \text{ tons acid}}{\text{day}} \times \frac{1 \text{ ton}}{2000 \text{ lb}} \times \frac{1 \text{ day}}{24 \text{ hr}} \times \frac{8,760 \text{ hr}}{\text{yr}} = 377.78 \text{ ton/yr}$$

PM/PM₁₀/PM_{2.5} (non-acid) Maximum Hourly Emissions

$$\frac{5.28 \text{ lb}}{\text{hr}} \times \frac{1,150 \text{ tons acid}}{\text{day}} \times \frac{\text{hr}}{63.12 \text{ tons acid}} \times \frac{\text{day}}{24 \text{ hr}} = 4.01 \text{ lb/hr}$$

PM/PM₁₀/PM_{2.5} (non-acid) Annual Emissions

$$\frac{3.75 \text{ lb}}{\text{hr}} \times \frac{1,150 \text{ tons acid}}{\text{day}} \times \frac{\text{hr}}{63.12 \text{ tons acid}} \times \frac{8,760 \text{ hr}}{\text{yr}} \times \frac{1 \text{ ton}}{2000 \text{ lb}} \times \frac{\text{day}}{24 \text{ hr}} = 12.47 \text{ ton/yr}$$

NO_x Maximum Hourly Emissions

$$\frac{96.8 \text{ ppmv}}{10^6} \times \frac{55,145 \text{ acf}}{\text{min}} \times \frac{1.0123 \text{ atm}}{549 \text{ R}} \times \frac{46 \text{ lb/lbmole}}{0.7302 \text{ atm-ft}^3/\text{lbmole-R}} \times \frac{60 \text{ min}}{\text{hr}} = 37.20 \text{ lb/hr}$$

NO_x Annual Emissions

$$\frac{36.8 \text{ ppmv}}{10^6} \times \frac{55,145 \text{ acf}}{\text{min}} \times \frac{1.0123 \text{ atm}}{549 \text{ R}} \times \frac{46 \text{ lb/lbmole}}{0.7302 \text{ atm-ft}^3/\text{lbmole-R}} \times \frac{60 \text{ min}}{\text{hr}} \times \frac{8,760 \text{ hr}}{\text{yr}} \times \frac{1 \text{ ton}}{2000 \text{ lb}} = 61.95 \text{ ton/yr}$$

HCl Maximum Hourly Emissions

$$\frac{502.8 \text{ lb Cl}}{\text{hr}} \times \frac{36.5 \text{ lb/lbmole HCl}}{35.5 \text{ lb/lbmole Cl}} \times \frac{1 \text{ lbmole HCl}}{\text{lbmole Cl}} \times \frac{1 - 99.969 \%}{1} = 0.16 \text{ lb/hr}$$

HCl Annual Emissions

$$\frac{0.16 \text{ lb}}{\text{hr}} \times \frac{8,760 \text{ hr}}{\text{yr}} \times \frac{1 \text{ ton}}{2000 \text{ lb}} = 0.70 \text{ ton/yr}$$

Cl₂ Maximum Hourly Emissions

$$\frac{0.16 \text{ lb HCl}}{\text{hr}} \times \frac{1 \text{ lb Cl}_2}{14.706 \text{ lb HCl}} = 0.011 \text{ lb/hr}$$

Cl₂ Annual Emissions

$$\frac{0.011 \text{ lb}}{\text{hr}} \times \frac{8,760 \text{ hr}}{\text{yr}} \times \frac{1 \text{ ton}}{2000 \text{ lb}} = 0.048 \text{ ton/yr}$$

H₂SO₄ (acid mist) Maximum Hourly Emissions

$$\frac{0.15 \text{ lb acid mist}}{\text{ton acid}} \times \frac{1,150 \text{ tons acid}}{\text{day}} \times \frac{\text{day}}{24 \text{ hr}} = 7.19 \text{ lb/hr}$$

H₂SO₄ (acid mist) Annual Emissions

$$\frac{0.10 \text{ lb acid mist}}{\text{ton acid}} \times \frac{1,150 \text{ tons acid}}{\text{day}} \times \frac{1 \text{ ton}}{2000 \text{ lb}} \times \frac{8,760 \text{ hr}}{\text{yr}} \times \frac{\text{day}}{24 \text{ hr}} = 20.99 \text{ ton/yr}$$

CO₂ Maximum Hourly Emissions

$$\frac{1.0123 \text{ atm} * 55145 \text{ acfm}}{549 \text{ R}} \times \frac{44 \text{ lb/lbmole}}{\text{lbmole}} \times \frac{60 \text{ min}}{\text{hr}} \times \frac{\text{lbmole-R}}{0.7302 \text{ atm-ft}^3} \times \frac{1,150}{969} \times \frac{10\%}{1} = 43627 \text{ lb/hr}$$

CO₂ Annual Emissions

$$\frac{1.0123 \text{ atm} * 55145 \text{ acfm}}{549 \text{ R}} \times \frac{44 \text{ lb}}{\text{lbmole}} \times \frac{60 \text{ min} * 8760 \text{ hr}}{\text{hr} * \text{year}} \times \frac{\text{lbmole-R}}{0.7302 \text{ atm-ft}^3} \times \frac{1,150}{969} \times \frac{8\%}{2000 \text{ lb}} = 152869 \text{ tpy}$$

EPN	CATSCNR2
FIN	CATSCNR2
Description	Catalyst screening for Regen 2

This is an MSS event related to catalyst screening.

Duration	218 hours/year
Total Volume screened	200,000 liters/year
Bulk Density	650 kg/m ³
Conversion factor	2.205 lb/kg
Conversion factor	1,000 liter/m ³
Total Mass =	Volume (liters/ year) * 1m ³ /1000L * 650 kg/m ³ * 2205 lb/kg
Total Mass =	286,650 lbs/year
Emission Factor	0.05%

Uncontrolled Emission lb/hr =	Processed lb/hr * Emission Factor
Uncontrolled Emission	143.33 lb/ year
Uncontrolled Emission lb/hr	0.66 lb/hr

Baghouse Parameters

Filter control eff.	99 %
Maximum loading	20000 ft ³ /min
Average loading	5000 ft ³ /min
Factor	7000 grain/lb

Controlled Emissions (lb/hr) =	Uncontrolled Emissions (lb/hr) * [1 - Control efficiency (%)]
Controlled Emissions (tpy) =	Controlled Emissions (lb/hr) * hours/year * 1ton/2000 lb

Pollutant	lb/hr	TPY
PM/PM ₁₀ /PM _{2.5} (catalyst screening)	6.57E-03	7.17E-04

Conversion of control efficiency to grain/scf

Grain Loading (grain/scf) =	Emission (lb/hr) * 1hr/60min * min/5000 scf * 7000 grain/lb
Grain Loading (grain/scf) =	0.000153406 grain/scf

The grain loading is < 0.01 grain/scf which meets the current TCEQ BACT.

APPENDIX B

STACK TEST RESULTS

**Table B-1. Test Results with Method 5/202 - Average 1,514.9 tons of acid/day
Baton Rouge Plant Unit 2**

Test Method	2/11/2011 Run 1 (lb/hr)	2/11/2011 Run 2 (lb/hr)	2/11/2011 Run 3 (lb/hr)	2/11/2011 Run 4 (lb/hr)	Average (lb/hr)
Method 5 (Filterable)	0.551	0.378	0.692	1.037	0.66
Method 202 (Condensable)	1.62	3.44	3.05	4.24	3.09
Total Method 5 and 202	2.17	3.82	3.74	5.28	3.75

Table B-2. Houston Regen 2 CO₂ Test Results

		Mode A			Mode B	
Gas Data	10/13/2010 Run 1	10/14/2010 Run 2	10/14/2010 Run 3	10/19/2010 Run 1	10/20/2010 Run 2	10/20/2010 Run 3
CO2 vol.% , dry basis	8	7.8	7.7	8.3	8.2	8.2
Average gas flow, acf/min	55165	54251	55636	52146	51352	51218
Exhaust Temperature, R	574	568	577	579	581	583

Stack Test Report for Baton Rouge Plant Unit 2

**USEPA CONSENT DECREE TESTING AND
RELATIVE ACCURACY TEST AUDIT REPORT
RHODIA, INC.
SULFURIC ACID REGENERATION UNIT NO. 2
BATON ROUGE, LOUISIANA
TEST DATES: 15-16 FEBRUARY 2011**

Prepared for:

RHODIA, INC.
1275 Airline Highway
Baton Rouge, LA 70805

Prepared by:

WESTON SOLUTIONS, INC.
1400 Weston Way
P.O. Box 2653
West Chester, Pennsylvania 19380

March 2011

W.O. No. 12143.078.010.0001

TABLE I
RHODIA INC.-BATON ROUGE, LA
UNIT 2 STACK

SUMMARY OF OTM 028 PARTICULATE TEST DATA AND TEST RESULTS

TEST DATA:	1	2	3
Test run number		UNIT 2 STACK	
Location			
Test date	02/15/11	02/15/11	02/15/11
Test time	0938-1054	1142-1257	1418-1530
SAMPLING DATA:			
Sampling duration, min.	60	60	60
Nozzle diameter, in.	0.195	0.190	0.190
Cross sectional nozzle area, sq.ft.	0.000207	0.000197	0.000197
Barometric pressure, in. Hg	30.17	30.17	30.17
Avg. orifice press. diff., in. H ₂ O	1.61	1.49	1.55
Avg. dry gas meter temp., deg. F	71.8	72.9	76.5
Avg. abs. dry gas meter temp., deg. R	532	533	537
Total liquid collected by train, ml	40.0	37.8	42.4
Std. vol. of H ₂ O vapor coll., cu.ft.	1.9	1.8	2.0
Dry gas meter calibration factor	0.9810	0.9810	0.9810
Sample vol. at meter cond., dcf	43.809	42.711	43.881
Sample vol. at std. cond., dscf (1)	43.178	41.996	42.863
Percent of isokinetic sampling	98.2	100.4	100.7
GAS STREAM COMPOSITION DATA:			
CO ₂ , % by volume, dry basis	5.2	5.5	5.8
O ₂ , % by volume, dry basis	8.4	8.3	8.3
N ₂ , % by volume, dry basis	86.4	86.2	85.9
Molecular wt. of dry gas, lb/lb mole	29.17	29.21	29.26
H ₂ O vapor in gas stream, prop. by vol.	0.042	0.041	0.045
Mole fraction of dry gas	0.958	0.959	0.955
Molecular wt. of wet gas, lb/lb mole	28.70	28.76	28.76
GAS STREAM VELOCITY AND VOLUMETRIC FLOW DATA:			
Static pressure, in. H ₂ O	0.85	0.85	0.85
Absolute pressure, in. Hg	30.23	30.23	30.23
Avg. temperature, deg. F	83.0	83.3	84.0
Avg. absolute temperature, deg. R	543	543	544
Pitot tube coefficient	0.84	0.84	0.84
Total number of traverse points	24	24	24
Avg. gas stream velocity, ft./sec.	62.6	62.7	64.1
Stack/duct cross sectional area, sq.ft.	28.270	28.270	28.270
Avg. gas stream volumetric flow, wacfm.	106,190	106,306	108,778
Avg. gas stream volumetric flow, dscfm.	99,926	100,106	101,892
PARTICULATE LABORATORY REPORT DATA			
Front half acetone rinse, g	0.0010	0.0012	0.0011
Filter, g	0.0008	0.0000	0.0011
Total particulate catch weight, g ⁽¹⁾	0.0018	0.0012	0.0022
FILTERABLE PARTICULATE EMISSIONS			
Conc., gr/dscf	0.0006	0.0004	0.0008
Emission rate, lbs/hr	0.551	0.378	0.692
CONDENSIBLE PARTICULATE LABORATORY REPORT			
Impinger residue, g	0.0063	0.0119	0.0107
Blank Train Impinger residue, g	0.00100	0.00100	0.00100
Blank corrected Impinger residue, g	0.00530	0.01090	0.00970
CONDENSIBLE PARTICULATE EMISSIONS			
Conc., gr/dscf	0.0019	0.0040	0.0035
Emission rate, lbs/hr	1.62	3.44	3.05
TOTAL PARTICULATE EMISSIONS			
Filterable and Condensible			
Conc., gr/dscf	0.0025	0.0044	0.0043
Emission rate, lbs/hr	2.17	3.82	3.74
SODIUM LABORATORY REPORT DATA			
FHA and Filter, g	0.000056	0.000081	0.000069
SODIUM EMISSIONS			
Conc., gr/dscf	0.000020	0.000030	0.000025
Emission rate, lbs/hr	0.017	0.026	0.022
Percent of total filterable particulate, %	3.11	6.75	3.14

(1) Standard conditions = 68 deg. F. (20 deg. C.) and 29.92 inches Hg (760mm Hg).

SUMMARY OF OTM 028 PARTICULATE TEST DATA AND TEST RESULTS

Test run number	4
Location	UNIT 2 STACK
Test date	02/15/11
Test time	1605-1717

Sampling duration, min.	60
Nozzle diameter, in.	0.190
Cross sectional nozzle area, sq.ft.	0.000197
Barometric pressure, in. Hg	30.17
Avg. orifice press. diff., in H ₂ O	1.54
Avg. dry gas meter temp., deg F	77.1
Avg. abs. dry gas meter temp., deg. R	537
Total liquid collected by train, ml	42.7
Std. vol. of H ₂ O vapor coll., cu.ft.	2.0
Dry gas meter calibration factor	0.9810
Sample vol. at meter cond., def	43.815
Sample vol. at std. cond., dscf (l)	42.750
Percent of isokinetic sampling	100.7

CO ₂ , % by volume, dry basis	5.9
O ₂ , % by volume, dry basis	8.4
N ₂ , % by volume, dry basis	85.7
Molecular wt. of dry gas, lb/lb mole	29.28
H ₂ O vapor in gas stream, prop. by vol.	0.045
Mole fraction of dry gas	0.955
Molecular wt. of wet gas, lb/lb mole	28.77

Static pressure, in. H ₂ O	0.85
Absolute pressure, in. Hg	30.23
Avg. temperature, deg. F	83.5
Avg. absolute temperature, deg.R	544
Pitot tube coefficient	0.84
Total number of traverse points	24
Avg. gas stream velocity, ft./sec.	63.9
Stack/duct cross sectional area, sq.ft.	28.270
Avg. gas stream volumetric flow, waeft/min.	108,412
Avg. gas stream volumetric flow, dscft/min.	101,599

Front half acetone rinse, g	0.0009
Filter, g	0.0024
Total particulate catch weight, g ⁽²⁾	0.0033

Conc., gr/dscf	0.0012
Emission rate, lbs/hr	1.037

Impinger residue, g	0.0145
Blank Train Impinger residue, g	0.00100
Blank corrected Impinger residue, g	0.01350

Conc., g/lsef	0.0049
Emission rate, lbs/hr	4.24

Filterable and Condensible	
Conc., gr/dscf	0.0061
Emission rate, lbs/hr	5.28

FHA and Filter, g	0.000061
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Conc., gr/dscf	0.000022
Emission rate, lbs/hr	0.019

1.85

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[illegible]

Stack Test Report for Houston Regen 2 CO₂ Test

Table 2-3
Summary of Emissions Test Results – Mode A

Parameter	Test Results				RCRA Permit Limit
	Run 1	Run 2	Run 3	Average	
Particulate Matter (PM)	0.00044	0.00075	0.00110	0.00076	0.08 gr/dscf @ 7% O ₂
Hydrogen Chloride (HCl)	0.024	0.027	0.029	0.027	0.103 g/sec
Chlorine (Cl ₂)	0.0022	< 0.0018	< 0.0021	≤ 0.0020	0.093 g/sec
Carbon Monoxide (CO) ¹	0.6	0.6	0.6	0.6	100 ppm @ 7% O ₂ (1 hour rolling average)
Arsenic ²	4.85E-5	4.79E-5	1.02E-4	6.61E-5	2.58E-4 g/sec
Beryllium (using RL) ³	< 5.75E-7	< 5.78E-7	< 5.70E-7	< 5.74E-7	1.6E-6 g/sec
Cadmium (using RL) ³	1.66E-5	< 2.31E-6	4.63E-5	≤ 2.17E-5	5.19E-5 g/sec
(using MDL) ³	1.66E-5	< 7.39E-8	4.63E-5	≤ 2.09E-5	
Hexavalent Chromium (using RL) ³	< 8.68E-6	< 9.44E-6	< 8.68E-6	< 8.93E-6	3.54E-4 g/sec
(using MDL) ³	< 2.28E-6	< 2.25E-6	< 2.23E-6	< 2.25E-6	
Antimony	6.28E-5	1.25E-4	6.19E-5	8.32E-5	NA ⁵
Lead	6.64E-5	4.83E-5	8.29E-5	6.59E-5	NA ⁵
Mercury	1.70E-4	2.04E-4	3.43E-4	2.39E-4	1.95 E-4 lb/hr
Barium	3.20E-5	< 1.83E-5	4.05E-3	≤ 1.37E-3	NA ⁵
Silver	< 1.83E-5	< 1.83E-5	4.79E-5	≤ 2.82E-5	NA ⁵
Thallium	< 1.83E-5	< 1.83E-5	< 1.81E-5	< 1.82E-5	NA ⁵
Nickel	2.61E-4	1.53E-4	2.08E-4	2.07E-4	8.00 E-4 lb/hr
Selenium	< 1.83E-5	2.93E-4	7.65E-5	≤ 1.29E-4	NA
Chlorinated Dioxins and Furans ⁴	6.51E-12	6.02E-11	4.01E-11	3.56E-11	2.0E-7 g/sec
Nitrogen Oxides as NO ₂ , lb/hr ¹	13.00	13.44	14.68	13.71	---
Total Hydrocarbon as propane, lb/hr ¹	0.072	< 0.036	< 0.035	≤ 0.048	---

- 1 Carbon monoxide (CO), nitrogen oxides (NO_x) and total hydrocarbon (THC) individual test run averages from temporary CEM system used during the trial burn. CO results are corrected to 7% O₂.
- 2 Metals results are blank corrected using site blanks (SB) and blank train (BT) analytical data.
- 3 Metals that were "non-detect" during analysis are reported using RL (Reporting Limit) or MDL (Method Detection Limit) for comparison to RCRA Permit Limit.
- 4 Maximum TEQ emission rates.
- 5 NA – Not Applicable

10/13 - 10/14/10
 RCRA TRIAL Burn Results
 High Furnace Temperature

Table 3-2

Summary of Process Operating Conditions During the Trial Burn – Mode A

Parameter		Current Limit	Mode A				Proposed Limit ^{2,3}
			Run 1	Run 2	Run 3	Average	
Hazardous Waste Feed Rate, lbs/min		464.81	333.90	341.42	340.39	338.57	313.26
Total Spike Stream Feed Rate, lbs/min		NA	12.79	12.80	12.79	12.79	
Bucket/Bag Feed Rate, per hour ⁽¹⁾		20	0	0	0	0	20
Minimum Main Gas Blower SO ₂ , %		5.5	8.36	8.26	9.03	8.55	5.5
Sulfuric Acid Production, ton/hr		38.28	28.52	27.93	28.00	28.15	38.28
Combustion Chamber Temperature, °F (max)		2,127	2150.94	2142.88	2146.29	2146.70	2146.70
Combustion Gas Velocity, ACFM (existing)		186,137	167,907	165,720	165,435	166,354	
Combustion Gas Velocity, ACFM (proposed)		186,137	172,897	170,429	170,178	171,168	171,168
Hourly Rolling Average for CO, (ppmv)		100	2.72	4.69	2.14	3.18	100
Combustion Chamber Pressure, H ₂ O		0.0	-1.41	-1.35	-1.37	-1.38	0.0
ESP Inlet Temperature, °F		120	90.09	86.07	89.33	88.50	120
Pressure Drop Across Demister, in H ₂ O		3	16.47	16.19	16.31	16.32	3
Total Power to ESP, KV	ESPI	50	67.77	67.85	68.22	67.95	50
	ESP2	50	66.36	66.01	65.94	66.10	50

- (1) Buckets/Bags were not fed during the Trial Burn.
- (2) Proposed limits are based upon averages of Mode A and/or Mode B values where applicable.
- (3) Proposed hazardous waste feed rate limit includes all waste feeds and spike streams.

TABLE 6-1
RHODIA - HOUSTON, TX
SUMMARY OF PARTICULATE, HCL₂, CL₂, NO_x, and THC TEST DATA AND TEST RESULTS

TEST DATA:	1	2	3
Test run number		Unit 2	
Location		Mode A	
Condition			
Test date	10-13-10	10-14-10	10-14-10
Test time period	0920-1204	0835-1112	1435-1714
SAMPLING DATA:			
Sampling duration, min.	120	120	120
Nozzle diameter, in.	0.248	0.248	0.248
Cross sectional nozzle area, sq. ft.	0.000335	0.000335	0.000335
Barometric pressure, in. Hg	29.90	30.02	30.02
Avg. orifice press. diff., in. H ₂ O	1.33	1.30	1.38
Avg. dry gas meter temp., deg. F	69.5	76.5	95.3
Avg. abs. dry gas meter temp., deg. R	550	537	555
Total liquid collected by trap, ml	6.5	5.8	3.2
Std. vol. of H ₂ O vapor coll., cu. ft.	0.3	0.3	0.2
Dry gas meter calibration factor	0.9970	0.9970	0.9970
Sample vol. at meter cond., dscf	75.511	73.784	77.143
Sample vol. at std. cond., dscf (1)	72.497	72.836	73.589
Percent of isokinetic sampling	99.2	100.0	99.8
GAS STREAM COMPOSITION DATA:			
CO ₂ , % by volume, dry basis	8.0	7.8	7.7 ← CO ₂
O ₂ , % by volume, dry basis	7.6	7.6	7.4
N ₂ , % by volume, dry basis	84.4	84.6	84.9
Molecular wt. of dry gas, lb/lb mole	29.58	29.55	29.53
H ₂ O vapor in gas stream, prop. by vol.	0.004	0.004	0.002
Mole fraction of dry gas	0.996	0.996	0.998
Molecular wt. of wet gas, lb/lb mole	29.5	29.5	29.5
GAS STREAM VELOCITY AND VOLUMETRIC FLOW DATA:			
Static pressure, in. H ₂ O	6.60	6.60	6.60
Static pressure, in. Hg	0.485	0.485	0.485
Absolute pressure, in. Hg	30.39	30.51	30.51
Avg. temperature, deg. F	114	108	117
Avg. absolute temperature, deg. R	574	568	577
Pilot tube coefficient	0.84	0.84	0.84
Total number of traverse points	12	12	12
Avg. gas stream velocity, ft/sec.	32.5	32.0	32.8
Stack/duct cross sectional area, sq. ft.	28.274	28.274	28.274
Avg. gas stream volumetric flow, scfm/min.	55165	54251	55676 ←
Avg. gas stream volumetric flow, dscf/min.	51330	51166	51802
Average SCFM (All tests per run)	52314	52103	51485
PARTICULATE LABORATORY REPORT DATA			
Front half acetone rinse, g	0.0020	0.0030	0.0020
Filter, g	0.0000	0.0004	0.0031
Total particulate catch weight, g	0.0020	0.0034	0.0051
PARTICULATE EMISSIONS			
Conc., gr/dscf (uncorrected)	0.00043	0.00072	0.00107
Conc., gr/dscf @ 7% O ₂	0.00044	0.00075	0.00110
Emission rate, lb/hr	0.18731	0.31593	0.47458
Cl₂ LABORATORY REPORT DATA			
Total Cl ₂ , mg	0.19	< 0.15	< 0.18
Cl₂ EMISSIONS			
Concentration, lbs/dscf	5.66E-09	< 4.54E-09	< 5.24E-09
Concentration, ppm/v	0.03	< 0.02	< 0.03
Concentration, ppm/v @ 7% O ₂	0.03	< 0.03	< 0.03
Mass rate, lb/hr	0.02	< 0.01	< 0.02
Mass rate, g/sec	0.0022	< 0.0018	< 0.0021
HCl LABORATORY REPORT DATA			
Total HCl, mg	2.050	2.300	2.430
HCl EMISSIONS			
Concentration, lbs/dscf	6.23E-08	6.96E-08	7.28E-08
Concentration, ppm/v	0.66	0.74	0.77
Concentration, ppm/v @ 7% O ₂	0.69	0.77	0.79
Mass rate, lb/hr	0.19	0.21	0.23
Mass rate, g/sec	0.024	0.027	0.029
NO_x AND THC EMISSIONS			
NO _x , ppm (as NO ₂)	34.7	36	39.8
THC, ppm (as propane)	0.2	< 0.1	< 0.1
NO _x , lb/hr (as NO ₂)	13.00	13.44	14.68
THC, lb/hr (as propane)	0.072	< 0.036	< 0.035

(1) Standard conditions = 68 deg. F. (20 deg. C.) and 29.92 inches Hg (760mm Hg).

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Table 2-4

Summary of Emissions Test Results – Mode B

Parameter	Test Results				RCRA Permit Limit
	Run 1	Run 2	Run 3	Average	
Particulate Matter (PM)	0.00093	0.00098	0.00079	0.00090	0.08 gr/dscf @ 7% O ₂
Hydrogen Chloride (HCl)	0.013	0.014	0.024	0.017	0.103 g/sec
Chlorine (Cl ₂)	< 0.0014	< 0.0017	< 0.0013	< 0.0015	0.093 g/sec
Carbon Monoxide (CO) ¹	29.4	26.3	31.4	29.0	100 ppm @ 7% O ₂ (1 hour rolling average)
Destruction Efficiency					
MCB, %	> 99.99972	> 99.99972	> 99.99972	> 99.99972	99.99%
TCE, %	> 99.99995	> 99.99995	> 99.99995	> 99.99995	99.99%
Volatile Organics	---	---	---	---	See Section 6 for detailed test results
Semivolatile Organics	---	---	---	---	
Chlorinated Dioxins and Furans ²	2.39E-13	9.63E-13	4.36E-11	1.49E-11	2.0E-7 g/sec
Nitrogen Oxides as NO ₂ , lb/hr ¹	6.60	5.48	5.07	5.72	—
Total Hydrocarbon as propane, lb/hr ¹	0.099	0.099	0.099	0.099	—

- 1 Carbon monoxide (CO), nitrogen oxides (NO_x) and total hydrocarbon (THC) individual test run averages from temporary CEM system used during the trial burn. CO results are corrected to 7% O₂.
- 2 Maximum TEQ emission rate.

10/19-10/22/10
RCRA TRIAL Burn Results
Low Furnace Temperature

Table 3-3

Summary of Process Operating Conditions during the Trial Burn – Mode B

Parameter		Current Limit	Mode B				Proposed Limit ^{2,3}
			Run 1	Run 2	Run 3	Average	
Hazardous Waste Feed Rate, lbs/min		464.81	269.96	258.69	262.15	263.60	313.26
Total Spike Stream Feed Rate, lb/min		NA	11.55	11.55	11.55	11.55	
Bucket/Bag Feed Rate, per hour ⁽¹⁾		20	0	0	0	0	20
Minimum Main Gas Blower SO ₂ , %		5.5	8.41	9.56	8.42	8.80	5.5
Sulfuric Acid Production, ton/hr		38.28	29.34	30.53	30.36	30.08	38.28
Combustion Chamber Temperature, °F (min)		1884	1889.39	1869.13	1864.44	1874.32	1874.32
Combustion Gas Velocity, ACFM (existing)		186,137	144,309	135,561	133,579	137,816	
Combustion Gas Velocity, ACFM (proposed)		186,137	148,269	139,241	137,446	141,652	171,168
Hourly Rolling Average for CO, (ppmv)		100	65.24	56.22	53.39	58.28	100
Combustion Chamber Pressure, H ₂ O		0.0	-1.79	-1.14	-1.23	-1.39	0.0
ESP Inlet Temperature, °F		120	91.76	94.29	94.10	93.38	120
Pressure Drop Across Demister, in H ₂ O		3	14.98	14.82	14.88	14.89	3
Total Power to ESP, KV	ESP1	50	69.14	69.68	69.55	69.46	50
	ESP2	50	70.82	73.10	71.70	71.87	50

- (1) Buckets/Bags were not fed during the Trial Burn.
- (2) Proposed limits are based upon averages of Mode A and/or Mode B values where applicable.
- (3) Proposed hazardous waste feed rate limit includes all waste feeds and spike streams.

SUMMARY OF PARTICULATE, HCL2, CL2, NOX, and THC TEST DATA AND TEST RESULTS

t 17:24 1302 47 P40

4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101 102 103 104 105 106 107 108 109 110 111 112 113 114 115 116 117 118 119 120 121 122 123 124 125 126 127 128 129 130 131 132 133 134 135 136 137 138 139 140 141 142 143 144 145 146 147 148 149 150 151 152 153 154 155 156 157 158 159 160 161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184 185 186 187 188 189 190 191 192 193 194 195 196 197 198 199 200 201 202 203 204 205 206 207 208 209 210 211 212 213 214 215 216 217 218 219 220 221 222 223 224 225 226 227 228 229 230 231 232 233 234 235 236 237 238 239 240 241 242 243 244 245 246 247 248 249 250 251 252 253 254 255 256 257 258 259 260 261 262 263 264 265 266 267 268 269 270 271 272 273 274 275 276 277 278 279 280 281 282 283 284 285 286 287 288 289 290 291 292 293 294 295 296 297 298 299 300 301 302 303 304 305 306 307 308 309 310 311 312 313 314 315 316 317 318 319 320 321 322 323 324 325 326 327 328 329 330 331 332 333 334 335 336 337 338 339 340 341 342 343 344 345 346 347 348 349 350 351 352 353 354 355 356 357 358 359 360 361 362 363 364 365 366 367 368 369 370 371 372 373 374 375 376 377 378 379 380 381 382 383 384 385 386 387 388 389 390 391 392 393 394 395 396 397 398 399 400 401 402 403 404 405 406 407 408 409 410 411 412 413 414 415 416 417 418 419 420 421 422 423 424 425 426 427 428 429 430 431 432 433 434 435 436 437 438 439 440 441 442 443 444 445 446 447 448 449 450 451 452 453 454 455 456 457 458 459 460 461 462 463 464 465 466 467 468 469 470 471 472 473 474 475 476 477 478 479 480 481 482 483 484 485 486 487 488 489 490 491 492 493 494 495 496 497 498 499 500 501 502 503 504 505 506 507 508 509 510 511 512 513 514 515 516 517 518 519 520 521 522 523 524 525 526 527 528 529 530 531 532 533 534 535 536 537 538 539 540 541 542 543 544 545 546 547 548 549 550 551 552 553 554 555 556 557 558 559 560 561 562 563 564 565 566 567 568 569 570 571 572 573 574 575 576 577 578 579 580 581 582 583 584 585 586 587 588 589 590 591 592 593 594 595 596 597 598 599 600 601 602 603 604 605 606 607 608 609 610 611 612 613 614 615 616 617 618 619 620 621 622 623 624 625 626 627 628 629 630 631 632 633 634 635 636 637 638 639 640 641 642 643 644 645 646 647 648 649 650 651 652 653 654 655 656 657 658 659 660 661 662 663 664 665 666 667 668 669 670 671 672 673 674 675 676 677 678 679 680 681 682 683 684 685 686 687 688 689 690 691 692 693 694 695 696 697 698 699 700 701 702 703 704 705 706 707 708 709 710 711 712 713 714 715 716 717 718 719 720 721 722 723 724 725 726 727 728 729 730 731 732 733 734 735 736 737 738 739 740 741 742 743 744 745 746 747 748 749 750 751 752 753 754 755 756 757 758 759 760 761 762 763 764 765 766 767 768 769 770 771 772 773 774 775 776 777 778 779 780 781 782 783 784 785 786 787 788 789 790 791 792 793 794 795 796 797 798 799 800 801 802 803 804 805 806 807 808 809 810 811 812 813 814 815 816 817 818 819 820 821 822 823 824 825 826 827 828 829 830 831 832 833 834 835 836 837 838 839 840 841 842 843 844 845 846 847 848 849 850 851 852 853 854 855 856 857 858 859 860 861 862 863 864 865 866 867 868 869 870 871 872 873 874 875 876 877 878 879 880 881 882 883 884 885 886 887 888 889 890 891 892 893 894 895 896 897 898 899 900 901 902 903 904 905 906 907 908 909 910 911 912 913 914 915 916 917 918 919 920 921 922 923 924 925 926 927 928 929 930 931 932 933 934 935 936 937 938 939 940 941 942 943 944 945 946 947 948 949 950 951 952 953 954 955 956 957 958 959 960 961 962 963 964 965 966 967 968 969 970 971 972 973 974 975 976 977 978 979 980 981 982 983 984 985 986 987 988 989 990 991 992 993 994 995 996 997 998 999 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023 1024 1025 1026 1027 1028 1029 1030 1031 1032 1033 1034 1035 1036 1037 1038 1039 1040 1041 10

APPENDIX C

BASELINE EMISSION CALCULATION

Baseline Emission Calculation

Year	Month	Acid Production Rate (ton/month)	NO _x (ton)	NO _x 24-month Rolling Average	PM/PM ₁₀ /PM _{2.5} (ton)	PM/PM ₁₀ /PM _{2.5} 24-month Rolling Average	SO ₂ (ton)	SO ₂ 24-month Rolling Average	H ₂ SO ₄ (ton)	H ₂ SO ₄ 24-month Rolling Average	CO ₂ (ton)	CO ₂ 24-month Rolling Average
2001	Jan	12,252	3.19		0.36		199.20		0.61		4,462.06	
	Feb	14,937	3.89		0.44		209.40		0.75		5,439.92	
	Mar	12,858	3.35		0.38		268.30		0.64		4,682.76	
	Apr	11,723	3.06		0.35		271.90		0.59		4,269.41	
	May	12,798	3.34		0.38		268.80		0.64		4,660.91	
	Jun	10,253	2.67		0.30		267.80		0.51		3,734.05	
	Jul	14,335	3.74		0.43		336.20		0.72		5,220.67	
	Aug	14,044	3.66		0.42		286.40		0.70		5,114.69	
	Sep	10,530	2.74		0.31		250.30		0.53		3,834.93	
	Oct	10,245	2.67		0.30		120.50		0.51		3,731.13	
	Nov	15,356	4.00		0.46		303.60		0.77		5,592.51	
	Dec	13,782	3.59		0.41		255.20		0.69		5,019.28	
2002	Jan	13,947	3.64		0.41		290.90		0.70		5,079.37	
	Feb	10,841	2.83		0.32		252.20		0.54		3,948.19	
	Mar	13,796	3.60		0.41		300.20		0.69		5,024.37	
	Apr	11,068	2.88		0.33		188.80		0.55		4,030.86	
	May	14,602	3.81		0.43		250.20		0.73		5,317.91	
	Jun	11,486	2.99		0.34		207.80		0.57		4,183.09	
	Jul	15,614	4.07		0.46		262.90		0.78		5,686.47	
	Aug	16,976	4.42		0.50		245.00		0.85		6,182.50	
	Sep	14,281	3.72		0.42		262.05		0.71		5,201.01	
	Oct	15,846	4.13		0.47		240.30		0.79		5,770.97	
	Nov	13,935	3.63		0.41		246.14		0.70		5,075.00	
	Dec	13,331	3.47	3.46	0.40	0.39	239.00	250.96	0.67	0.66	4,855.03	4838.21
2003	Jan	12,369	3.22	3.46	0.37	0.39	222.10	251.92	0.62	0.66	4,504.67	4839.99
	Feb	10,386	2.71	3.41	0.31	0.39	256.10	253.86	0.52	0.66	3,782.48	4770.93
	Mar	14,804	3.86	3.44	0.44	0.39	317.00	255.89	0.74	0.66	5,391.48	4800.46
	Apr	4,449	1.16	3.36	0.13	0.38	154.90	251.02	0.22	0.64	1,620.28	4690.08
	May	14,613	3.81	3.38	0.43	0.38	184.90	247.52	0.73	0.65	5,321.92	4717.62
	Jun	21,059	5.49	3.49	0.63	0.40	248.60	246.72	1.05	0.67	7,669.49	4881.60
	Jul	17,201	4.48	3.52	0.51	0.40	288.30	244.72	0.86	0.68	6,264.44	4925.09
	Aug	17,992	4.69	3.57	0.53	0.41	230.10	242.38	0.90	0.68	6,552.52	4985.00
	Sep	18,064	4.71	3.65	0.54	0.42	237.96	241.86	0.90	0.70	6,578.74	5099.32
	Oct	17,705	4.61	3.73	0.53	0.43	340.60	251.04	0.89	0.72	6,448.00	5212.52
	Nov	17,180	4.48	3.75	0.51	0.43	333.20	252.27	0.86	0.72	6,256.80	5240.20
	Dec	8,295	2.16	3.69	0.25	0.42	270.20	252.89	0.41	0.71	3,020.96	5156.94
2004	Jan	16,490	4.30	3.72	0.49	0.42	309.50	253.67	0.82	0.71	6,005.50	5195.53
	Feb	6,789	1.77	3.67	0.20	0.42	143.80	249.15	0.34	0.70	2,472.49	5134.04
	Mar	16,507	4.30	3.70	0.49	0.42	328.00	250.31	0.83	0.71	6,011.70	5175.18
	Apr	20,242	5.28	3.80	0.60	0.43	338.60	256.55	1.01	0.73	7,371.95	5314.39
	May	16,688	4.35	3.83	0.50	0.44	283.90	257.96	0.83	0.73	6,077.61	5346.05
	Jun	18,643	4.86	3.90	0.55	0.44	247.60	259.61	0.93	0.75	6,789.61	5454.65
	Jul	14,239	3.71	3.89	0.42	0.44	317.50	261.89	0.71	0.75	5,185.71	5433.79
	Aug	13,602	3.55	3.85	0.40	0.44	311.70	264.67	0.68	0.74	4,953.72	5382.59
	Sep	13,872	3.62	3.85	0.41	0.44	347.10	268.21	0.69	0.74	5,052.05	5376.38
	Oct	17,317	4.51	3.86	0.51	0.44	378.60	273.98	0.87	0.74	6,306.69	5398.70
	Nov	14,293	3.73	3.87	0.42	0.44	309.00	276.59	0.71	0.74	5,205.38	5404.13
	Dec	18,375	4.79	3.92	0.55	0.45	285.60	278.54	0.92	0.75	6,692.00	5480.67

Baseline Emission Calculation

Year	Month	Acid Production Rate (ton/month)	NOx (ton)	NOx 24-month Rolling Average	PM/PM ₁₀ /PM _{2.5} (ton)	PM/PM ₁₀ /PM _{2.5} 24-month Rolling Average	SO ₂ (ton)	SO ₂ 24-month Rolling Average	H ₂ SO ₄ (ton)	H ₂ SO ₄ 24-month Rolling Average	CO ₂ (ton)	CO ₂ 24-month Rolling Average
2005	Jan	17,757	4.63	3.98	0.53	0.45	336.00	283.28	0.89	0.76	6,466.93	5562.44
	Feb	3,632	0.95	3.91	0.11	0.45	98.20	276.70	0.18	0.75	1,322.74	5459.95
	Mar	19,409	5.06	3.96	0.58	0.45	347.60	277.98	0.97	0.76	7,068.58	5529.83
	Apr	18,838	4.91	4.11	0.56	0.47	320.40	284.87	0.94	0.79	6,860.62	5748.17
	May	14,893	3.88	4.12	0.44	0.47	263.70	288.16	0.74	0.79	5,423.89	5752.42
	Jun	19,562	5.10	4.10	0.58	0.47	333.90	291.71	0.98	0.79	7,124.30	5729.71
	Jul	19,662	5.12	4.13	0.58	0.47	369.10	295.08	0.98	0.79	7,160.72	5767.05
	Aug	19,513	5.09	4.14	0.58	0.47	354.10	300.24	0.98	0.79	7,106.45	5790.13
	Sep	13,449	3.51	4.09	0.40	0.47	214.00	299.25	0.67	0.79	4,898.00	5720.10
	Oct	15,493	4.04	4.07	0.46	0.46	380.20	300.90	0.77	0.78	5,642.41	5686.53
	Nov	18,345	4.78	4.08	0.54	0.47	370.50	302.45	0.92	0.78	6,681.08	5704.21
	Dec	21,376	5.57	4.22	0.63	0.48	324.20	304.70	1.07	0.81	7,784.94	5902.71
2006	Jan	20,466	5.33	4.27	0.61	0.49	352.50	306.49	1.02	0.82	7,453.53	5963.05
	Feb	8,662	2.26	4.29	0.26	0.49	205.40	309.06	0.43	0.82	3,154.62	5991.47
	Mar	14,677	3.83	4.27	0.44	0.49	350.90	310.01	0.73	0.82	5,345.23	5963.70
	Apr	18,579	4.84	4.25	0.55	0.48	387.90	312.07	0.93	0.82	6,766.30	5938.46
	May	18,541	4.83	4.27	0.55	0.49	382.60	316.18	0.93	0.82	6,752.46	5966.58
	Jun	17,718	4.62	4.26	0.53	0.49	361.20	320.91	0.89	0.82	6,452.73	5952.54
	Jul	18,778	4.89	4.31	0.56	0.49	366.80	322.97	0.94	0.83	6,838.77	6021.42
	Aug	16,758	4.37	4.34	0.50	0.50	361.50	325.04	0.84	0.83	6,103.11	6069.31
	Sep	18,863	4.92	4.40	0.56	0.50	372.20	326.09	0.94	0.84	6,869.73	6145.05
	Oct	17,069	4.45	4.40	0.51	0.50	370.30	325.74	0.85	0.84	6,216.37	6141.29
	Nov	17,787	4.64	4.43	0.53	0.51	369.55	328.26	0.89	0.85	6,477.86	6194.31
	Dec	14,671	3.82	4.39	0.44	0.50	372.90	331.90	0.73	0.84	5,343.04	6138.10
2007	Jan	11,079	2.89	4.32	0.33	0.49	190.00	325.82	0.55	0.83	4,034.87	6036.76
	Feb	18,400	4.80	4.48	0.55	0.51	290.40	333.83	0.92	0.86	6,701.11	6260.86
	Mar	18,640	4.86	4.47	0.55	0.51	350.90	333.96	0.93	0.86	6,788.51	6249.19
	Apr	18,888	4.92	4.47	0.56	0.51	285.50	332.51	0.94	0.86	6,878.83	6249.95
	May	20,913	5.45	4.54	0.62	0.52	270.29	332.79	1.05	0.87	7,616.32	6341.30
	Jun	18,988	4.95	4.53	0.56	0.52	361.20	333.92	0.95	0.87	6,915.25	6332.59
	Jul	19,941	5.20	4.54	0.59	0.52	278.90	330.16	1.00	0.87	7,262.33	6336.83
	Aug	19,626	5.12	4.54	0.58	0.52	278.90	327.03	0.98	0.87	7,147.61	6338.54
	Sep	16,640	4.34	4.57	0.49	0.52	256.10	328.79	0.83	0.88	6,060.13	6386.96
	Oct	20,624	5.38	4.63	0.61	0.53	299.80	325.44	1.03	0.89	7,511.07	6464.82
	Nov	19,903	5.19	4.64	0.59	0.53	271.60	321.31	1.00	0.89	7,248.49	6488.47
	Dec	19,865	5.18	4.63	0.59	0.53	299.70	320.29	0.99	0.89	7,234.65	6465.54
2008	Jan	20,293	5.29	4.63	0.60	0.53	305.10	318.32	1.01	0.89	7,390.52	6462.91
	Feb	5,941	1.55	4.60	0.18	0.52	109.90	314.34	0.30	0.88	2,163.66	6421.62
	Mar	20,794	5.42	4.66	0.62	0.53	341.70	313.96	1.04	0.89	7,572.98	6514.45
	Apr	22,152	5.77	4.70	0.66	0.54	318.40	311.06	1.11	0.90	8,067.55	6568.66
	May	21,004	5.47	4.73	0.62	0.54	326.20	308.71	1.05	0.91	7,649.46	6606.04
	Jun	14,109	3.68	4.69	0.42	0.53	264.90	304.70	0.71	0.90	5,138.37	6551.27
	Jul	17,863	4.66	4.68	0.53	0.53	320.20	302.76	0.89	0.90	6,505.54	6537.39
	Aug	18,676	4.87	4.70	0.55	0.54	323.80	301.19	0.93	0.90	6,801.62	6566.49
	Sep	10,170	2.65	4.61	0.30	0.52	123.60	290.83	0.51	0.88	3,703.82	6434.58
	Oct	18,350	4.78	4.62	0.55	0.53	311.97	288.40	0.92	0.89	6,682.90	6454.02
	Nov	22,364	5.83	4.67	0.66	0.53	313.50	286.06	1.12	0.90	8,144.76	6523.47
	Dec	17,713	4.62	4.70	0.53	0.54	305.90	283.27	0.89	0.90	6,450.91	6569.64

Baseline Emission Calculation

Year	Month	Acid Production Rate (ton/month)	NOx (ton)	NOx 24-month Rolling Average	PM/PM ₁₀ /PM _{2.5} (ton)	PM/PM ₁₀ /PM _{2.5} 24-month Rolling Average	SO ₂ (ton)	SO ₂ 24-month Rolling Average	H ₂ SO ₄ (ton)	H ₂ SO ₄ 24-month Rolling Average	CO ₂ (ton)	CO ₂ 24-month Rolling Average
2009	Jan	15,671	4.08	4.75	0.47	0.54	317.60	288.59	0.78	0.91	5,707.23	6639.32
	Feb	16,778	4.37	4.73	0.50	0.54	298.70	288.93	0.84	0.91	6,110.39	6614.70
	Mar	17,630	4.60	4.72	0.52	0.54	298.50	286.75	0.88	0.91	6,420.68	6599.38
	Apr	16,850	4.39	4.70	0.50	0.54	311.40	287.83	0.84	0.90	6,136.61	6568.45
	May	16,042	4.18	4.65	0.48	0.53	242.60	286.67	0.80	0.89	5,842.35	6494.54
	Jun	16,534	4.31	4.62	0.49	0.53	307.50	284.44	0.83	0.89	6,021.53	6457.30
	Jul	16,407	4.28	4.58	0.49	0.52	328.90	286.52	0.82	0.88	5,975.28	6403.67
	Aug	17,759	4.63	4.56	0.53	0.52	348.00	289.40	0.89	0.88	6,467.66	6375.34
	Sep	15,595	4.06	4.55	0.46	0.52	338.00	292.81	0.78	0.87	5,679.55	6359.48
	Oct	6,844	1.78	4.40	0.20	0.50	132.30	285.83	0.34	0.84	2,492.52	6150.38
	Nov	8,335	2.17	4.28	0.25	0.49	175.90	281.84	0.42	0.82	3,035.53	5974.84
	Dec	17,028	4.44	4.25	0.51	0.48	355.58	284.17	0.85	0.81	6,201.44	5931.79
2010	Jan	14,728	3.84	4.18	0.44	0.48	329.70	285.20	0.74	0.80	5,363.80	5847.34
	Feb	15,284	3.98	4.29	0.45	0.49	297.80	293.03	0.76	0.82	5,566.29	5989.12
	Mar	18,813	4.90	4.26	0.56	0.49	361.10	293.84	0.94	0.82	6,851.52	5959.05
	Apr	15,777	4.11	4.20	0.47	0.48	342.22	294.83	0.79	0.80	5,745.84	5862.32
	May	6,290	1.64	4.04	0.19	0.46	218.55	290.34	0.31	0.77	2,290.76	5639.04
	Jun	7,675	2.00	3.97	0.23	0.45	242.14	289.39	0.38	0.76	2,795.16	5541.40
	Jul	17,939	4.68	3.97	0.53	0.45	392.88	292.42	0.90	0.76	6,533.22	5542.56
	Aug	23,427	6.11	4.02	0.70	0.46	396.36	295.45	1.17	0.77	8,531.89	5614.65
	Sep	5,687	1.48	3.97	0.17	0.45	173.87	297.54	0.28	0.76	2,071.15	5546.62
	Oct	16,703	4.35	3.95	0.50	0.45	364.40	299.73	0.84	0.76	6,083.08	5521.63
	Nov	16,436	4.28	3.89	0.49	0.44	337.77	300.74	0.82	0.75	5,985.84	5431.68
	Dec	16,590	4.32	3.88	0.49	0.44	378.66	303.77	0.83	0.74	6,041.92	5414.63
2011	Jan	20,973	5.47	3.93	0.62	0.45	401.20	307.25	1.05	0.75	7,638.17	5495.09
	Feb	12,928	3.37	3.89	0.38	0.44	260.91	305.68	0.65	0.75	4,708.26	5436.67
	Mar	3,618	0.94	3.74	0.11	0.43	94.73	297.19	0.18	0.72	1,317.64	5224.04
	Apr	22,366	5.83	3.80	0.66	0.43	323.80	297.70	1.12	0.73	8,145.49	5307.74
Maximum				4.75		0.54		333.96		0.91		6,639.32
Baseline tpy (=maximum * 12)				57.02		6.50		4,007.58		10.94		79,671.80

PROJECT INCREASE AND NETTING ANALYSIS

BASELINE ACTUAL EMISSIONS

EPN	Emission Unit Description	H ₂ SO ₄ (tpy)	PM (tpy)	PM ₁₀ (tpy)	PM _{2.5} (tpy)	SO ₂ (tpy)	NOx (tpy)	CO ₂ (tpy)
104	Regeneration Unit No. 2 Stack	10.94	6.50	6.50	6.50	4007.58	57.02	79,671.80

POTENTIAL/PROPOSED EMISSIONS

EPN	Emission Unit Description	H ₂ SO ₄ (tpy)	PM (tpy)	PM ₁₀ (tpy)	PM _{2.5} (tpy)	SO ₂ (tpy)	NOx (tpy)	CO ₂ (tpy)
104	Regeneration Unit No. 2 Stack	20.99	12.47	12.47	12.47	377.78	61.95	152,869.03
CATSCNR2	Catalyst screening for Regen 2	-	7.17E-04	7.17E-04	7.17E-04	-	-	-
Total	Regeneration Unit No. 2 Stack and Catalyst screening for Regen 2	20.99	12.47	12.47	12.47	377.78	61.95	152,869.03

POTENTIAL EMISSIONS MINUS BASELINE ACTUAL EMISSIONS

EPN	Emission Unit Description	H ₂ SO ₄ (tpy)	PM (tpy)	PM ₁₀ (tpy)	PM _{2.5} (tpy)	SO ₂ (tpy)	NOx (tpy)	CO ₂ (tpy)
104	Regeneration Unit No. 2 Stack	10.05	5.97	5.97	5.97	-3629.80	4.92	73,197.22

Emission Increases	10.05	5.97	5.97	5.97	-3629.80	4.92	73,197.22
PSD or NA <i>de minimis</i> Level	7	25	15	10	40	5	75,000
Is PSD or NA <i>de minimis</i> level exceeded ?	Yes	No	No	No	No	No	No

HISTORICAL PROJECT INCREASE

Permit 4802, Project 064402.0005, 2/2006 amendment

Tank Number	Turnover, gallons/year	SCF/year
78	6,500,000	13,155,120

SCF/year came from 044402.0134

Use the same logic for 12/2006 (Project 064402.0109) for estimating scf/year.

EPN 104, Furnace Stack

120 MMBtu/hr

Based on application dated 12/27/2004, Project 044402.0134

Furnace Emission Factor

Pollutant	Factor*, lb/MMBtu
NOx	0.31
CO	0.0475
H2SO4	0.05
SO2	10.42
PM/PM10/PM2.5	0.028

*These are estimated factors based on the ratio of lb/hr emission rate to heat input of 120 MMBtu/hr.

$\text{NOx tpy} = 89.37 \text{ BTU/scf} * \text{Vol scf/yr} * 0.3 \text{ lb NOx/MMBtu} * \text{MMBtu}/10\text{E6 Btu} * \text{ton}/2000\text{lb}$

Emission Rate Increases from EPN 104

Pollutant	Increase, tpy
NOx	0.1822
CO	0.0279
H2SO4	0.0297
SO2	6.1232
PM/PM10/PM2.5	0.0165

Permit 4802, Project 064402.0109, 12/2006 amendment

Tank Number	Old Turnover, gallons/year	New Turnover, gallons/year
48	2,578,000	10,000,000
49	8,590,900	28,000,000
56	8,080,600	10,000,000
78	6,500,000	6,500,000
53	-	2,800,000

Prior to 12/2006 Rhodia Design Analysis for Working Losses for 48,49,56

14152320 scf/year

Tank	Ratio of Working Loss based on past turnovers, scf	Kn Factor	Calculated Working Loss based on New Turnovers, scf
48	1,895,357	1	7,352,046
49	6,316,069	0.516	10,612,022
56	5,940,894	1	7,352,046
53		1	2,058,573

Based on Project 064402.0109, Calcs-detail-rev6.xls

27,374,686

Breathing loss

11957400 scf/year

Hazardous tank truck purging

(550 trucks/year) x (5,000 gallons/truck) x (20% VOC) x (0.1337 ft³/gallon) =

73535 scf/year

Source	Past Loss, scf	Proposed Loss, scf
Spent Acid Tanks	14,152,320	39,332,086
Haz Purging	0	73,535

Heating value

Pollutant	max wt%	avg wt%	MW	max mol%	avg mol%	Net Heating Value BTU/scf	max Heating value BTU/scf	avg Heating value BTU/scf
Ethylene	0.10%	0.07%	28	0.12%	0.08%	1471	1.765	1.177
Propane	1.84%	1.28%	44	1.42%	0.92%	2272	32.262	20.902
Iso-Butane	1.43%	1.00%	58	0.83%	0.54%	2956	24.535	15.962
n-Butane	4.31%	2.99%	58	2.45%	1.59%	2956	72.422	47.000
non-specified (as Iso-Pentane)	0.38%	0.27%	72	0.18%	0.12%	3605	6.489	4.326
SO2	25.30%	17.55%		13.37%	8.68%		137.47	89.37

Values are based on P084402\0064\calc-EPN170-20100224.xlsx

Avg VOC Conc

3.25%

Avg VOC MW

1.749

EPN 104, Furnace Stack

120 MMBtu/hr

Based on application dated 12/27/2004, Project 044402.0134

Furnace Emission Factor

Pollutant	Factor*, lb/MMBtu
NOx	0.31
CO	0.0475
H2SO4	0.0505
SO2	10.42
PM	0.028

*These are estimated factors based on the ratio of lb/hr emission rate to heat input of 120 MMBtu/hr.

NOx tpy = 89.37 BTU/scf * Vol scf/yr * 0.3 lb NOx/MMBtu * MMBtu/10E6 Btu * ton/2000lb

Emission Rate Increases from EPN 104

Pollutant	Past, tpy	Proposed, tpy	Increase, tpy
NOx	0.1960	0.5458	0.350
CO	0.0300	0.0836	0.054
H2SO4	0.0319	0.0889	0.057
SO2	6.5873	18.3417	11.75
PM	0.0178	0.0496	0.03

Vapor Combustors EPN 120 and 170

Vapor Combustor Emission Factors

Pollutant	Factor	Unit	
VOC	98%	VOC DRE	Flare efficiency
NOx	0.0641	lb/MMBtu	"Flares and Vapor Oxidizers, October 2000".
CO	0.5496	lb/MMBtu	"Flares and Vapor Oxidizers, October 2000".
HCl	0.1638	of VOC	This is based on Rhodia's estimation
Cl2	0.0319	of VOC	This is based on Rhodia's estimation
SO2	99.90%		

EPN 170, vapor combustor 2

When furnace is down 15% of the time (1314 hrs/yr), the emissions are routed to EPN 170.

15% of the total losses from Spent Tanks

Past Loss, scf	Proposed Loss, scf
2,122,848	5,899,813

CO or NOx, tpy = 89.37 Btu/scf * vol scf/year * MMBtu/10E6 Btu * lb/MMBtu * ton/2000 lb

VOC, tpy = mol%*14.7 psia * scf/year * 1.749 lb/lbmole * 1/520R * lbmole-R/10.73 psia-ft3 * (1-0.98)* ton/2000 lb

SO2, tpy = mol%*14.7 psia * scf/year * 64 lb/lbmole * 1/520R * lbmole-R/10.73 psia-ft3 * (1-0.999)* ton/2000 lb

Emission Rate Increases from EPN 170

Pollutant	Past, tpy	Proposed, tpy	Increase, tpy
NOx	0.0061	0.0169	0.011
CO	0.0521	0.1449	0.093
VOC	0.0032	0.0088	0.006
SO2	0.0155	0.0432	0.028

Vapor Combustor EPN 120

The new annual tank truck numbers is 550 truck/year. However, the old number is not known. To be conservative, assume past emissions are zero. Proposed emissions are either MAERT limit or emissions associated with the tank truck.

Emission Rate Increases from EPN 120 during furnace MSS

Pollutant	Past, tpy	Proposed, tpy	Increase, tpy
NOx	0	0.32	0.32
CO	0	0.27	0.27
VOC	0	0.12	0.12

APPENDIX D

RBLC SEARCH RESULTS

n RBLC - Acid Mist

THROUGHPUT		POLLUTANT	CONTROL METHOD DESCRIPTION	PERCENT EFFICIENCY
550	T/D	Sulfuric Acid (mist, vapors, etc)	BRINK MIST ELIMINATOR	99.9
3,000	T/D	Sulfuric Acid (mist, vapors, etc)	MIST ELIMINATORS	99
3,400	T/D	Acid Mist / Gases	MIST ELIMINATORS	99
3,000	t/d	Sulfuric Acid (mist, vapors, etc)	MIST ELIMINATORS	99
		Sulfuric Acid (mist, vapors, etc)	BROWNIAN DIFFUSION MIST ELIMINATION CANDLES IN BOTH THE INTERPASS ABSORBER TOWER AND THE FINAL ABSORBER TOWER	0
2,300	T/D	Sulfuric Acid (mist, vapors, etc)	BROWNIAN DIFFUSION CANDLES	0
2,000	T/D	Sulfuric Acid (mist, vapors, etc)	CONDENSERS, WET ELECTROSTATIC PRECIPITATORS, AND HYDROGEN PEROXIDE SCRUBBERS	0
		Sulfuric Acid (mist, vapors, etc)	FIXED ROOFS, SUBMERGED FILL PIPES, AND NITROGEN BLANKET	0
1,800	T/D	Sulfuric Acid (mist, vapors, etc)	Vertical tube mist eliminators (aka candles)	0
1,800	T/D	Sulfuric Acid (mist, vapors, etc)	Vertical tube mist eliminators (aka candles)	0
1,850	T/D	Sulfuric Acid (mist, vapors, etc)	VERTICAL TUBE MIST ELIMINATOR	0
400	T/D	Sulfuric Acid (mist, vapors, etc)	MIST ELIMINATOR	0
400	T/D	Sulfuric Acid (mist, vapors, etc)	MIST ELMINATOR	0
		Sulfuric Acid (mist, vapors, etc)	SCRUBBER	0

n RBLC - Acid Mist

THROUGHPUT		POLLUTANT	CONTROL METHOD DESCRIPTION	PERCENT EFFICIENCY
		Sulfuric Acid (mist, vapors, etc)	NONE INDICATED	0
		Sulfuric Acid (mist, vapors, etc)		0
		Sulfuric Acid (mist, vapors, etc)		0
		Sulfuric Acid (mist, vapors, etc)	MIST ELIMINATOR	0
2,600	T/D	Sulfuric Acid (mist, vapors, etc)	MIST ELIMINATOR	99
		Sulfuric Acid (mist, vapors, etc)	H2SO4 MIST BACT IS USE OF FILTER MEDIA TO CAPTURE ACID MIST.	99

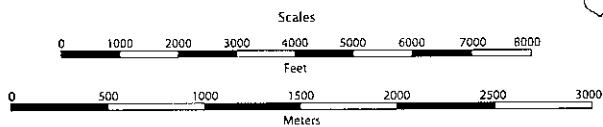
APPENDIX E

LAND USE DETERMINATION

Rhodia, Inc. - Houston Plant
Area Map



Park Place, Pasadena, and Settegast Quadrangles



Trinity
Consultants

U.S. CENSUS BUREAU DATA FOR HOUSTON

State & County QuickFacts

Houston (city), Texas

People QuickFacts	Houston	Texas
Population, 2006 estimate	2,144,491	23,507,783
Population, percent change, April 1, 2000 to July 1, 2006	8.8%	12.7%
Population, 2000	1,953,631	20,851,820
Persons under 5 years old, percent, 2000	8.2%	7.8%
Persons under 18 years old, percent, 2000	27.5%	28.2%
Persons 65 years old and over, percent, 2000	8.4%	9.9%
Female persons, percent, 2000	50.1%	50.4%
White persons, percent, 2000 (a)	49.3%	71.0%
Black persons, percent, 2000 (a)	25.3%	11.5%
American Indian and Alaska Native persons, percent, 2000 (a)	0.4%	0.6%
Asian persons, percent, 2000 (a)	5.3%	2.7%
Native Hawaiian and Other Pacific Islander, percent, 2000 (a)	0.1%	0.1%
Persons reporting two or more races, percent, 2000	3.1%	2.5%
Persons of Hispanic or Latino origin, percent, 2000 (b)	37.4%	32.0%
Living in same house in 1995 and 2000, pct 5 yrs old & over	46.9%	49.6%
Foreign born persons, percent, 2000	26.4%	13.9%
Language other than English spoken at home, pct age 5+, 2000	41.3%	31.2%
High school graduates, percent of persons age 25+, 2000	70.4%	75.7%
Bachelor's degree or higher, pct of persons age 25+, 2000	27.0%	23.2%
Mean travel time to work (minutes), workers age 16+, 2000	27.4	25.4
Housing units, 2000	782,009	8,157,575
Homeownership rate, 2000	45.8%	63.8%
Median value of owner-occupied housing units, 2000	\$79,300	\$82,500
Households, 2000	717,945	7,393,354
Persons per household, 2000	2.67	2.74
Median household income, 1999	\$36,616	\$39,927
Per capita money income, 1999	\$20,101	\$19,617
Persons below poverty, percent, 1999	19.2%	15.4%
Business QuickFacts	Houston	Texas
Wholesale trade sales, 2002 (\$1000)	122,727,158	397,405,111
Retail sales, 2002 (\$1000)	25,813,909	228,694,755
Retail sales per capita, 2002	\$12,889	\$10,528
Accommodation and foodservices sales, 2002 (\$1000)	4,155,251	29,914,774
Total number of firms, 2002	187,124	1,734,509
Black-owned firms, percent, 2002	11.3%	5.1%
American Indian and Alaska Native owned firms, percent, 2002	1.0%	0.9%
Asian-owned firms, percent, 2002	8.5%	4.5%
Hispanic-owned firms, percent, 2002	22.3%	18.4%
Native Hawaiian and Other Pacific Islander owned firms, percent, 2002	S	0.1%

Women-owned firms, percent, 2002

27.6%

27.0%

Geography QuickFacts	Houston	Texas
Land area, 2000 (square miles)	579	261,797
Persons per square mile, 2000	3,371.7	79.6
FIPS Code	35000	48
Counties		

(a) Includes persons reporting only one race.

(b) Hispanics may be of any race, so also are included in applicable race categories.

D: Suppressed to avoid disclosure of confidential information

F: Fewer than 100 firms

FN: Footnote on this item for this area in place of data

NA: Not available

S: Suppressed; does not meet publication standards

X: Not applicable

Z: Value greater than zero but less than half unit of measure shown

Source U.S. Census Bureau: State and County QuickFacts. Data derived from Population Estimates, 2000 Census of Population and Housing, 1990 Census of Population and Housing, Small Area Income and Poverty Estimates, County Business Patterns, 2002 Economic Census, Minority- and Women-Owned Business, Building Permits, Consolidated Federal Funds Report, Census of Governments

Last Revised: Wednesday, 08-Jul-2009 18:32:24 EDT

AERSURFACE RESULTS

AERSURFACE RESULT - AVERAGE SURFACE MOISTURE

** GENERATED BY AERSURFACE, DATED 08009
** CENTER UTM EASTING (METERS): 280235.0
** CENTER UTM NORTHING (METERS): 3289955.0
** UTM ZONE: 15 DATUM: NAD83
** STUDY RADIUS (KM) FOR SURFACE ROUGHNESS: 1.0
** AIRPORT? N, CONTINUOUS SNOW COVER? N
** SURFACE MOISTURE? AVERAGE, ARID REGION? N
** MONTH/SEASON ASSIGNMENTS? DEFAULT
** LATE AUTUMN AFTER FROST AND HARVEST, OR WINTER WITH NO SNOW: 12 1 2
** WINTER WITH CONTINUOUS SNOW ON THE GROUND: 0
** TRANSITIONAL SPRING (PARTIAL GREEN COVERAGE, SHORT ANNUALS): 3 4 5
** MIDSUMMER WITH LUSH VEGETATION: 6 7 8
** AUTUMN WITH UNHARVESTED CROPLAND: 9 10 11
**

FREQ_SECT ANNUAL 1

SECTOR 1 0 360

**	SECT	ALB	Bo	Zo	
SITE_CHAR	1	1	0.17	1.04	0.375

AERSURFACE RESULT - DRY SURFACE MOISTURE

** Generated by AERSURFACE, dated 08009
** Center UTM Easting (meters): 280235.0
** Center UTM Northing (meters): 3289955.0
** UTM Zone: 15 Datum: NAD83
** Study radius (km) for surface roughness: 1.0
** Airport? N, Continuous snow cover? N
** Surface moisture? Dry, Arid region? N
** Month/Season assignments? Default
** Late autumn after frost and harvest, or winter with no snow: 12 1 2
** Winter with continuous snow on the ground: 0
** Transitional spring (partial green coverage, short annuals): 3 4 5
** Midsummer with lush vegetation: 6 7 8
** Autumn with unharvested cropland: 9 10 11
**

FREQ_SECT ANNUAL 1

SECTOR 1 0 360

**		Sect	Alb	Bo	Zo	
	SITE_CHAR	1	1	0.17	2.28	0.375

AERSURFACE RESULT - WET SURFACE MOISTURE

** Generated by AERSURFACE, dated 08009
** Center UTM Easting (meters): 280235.0
** Center UTM Northing (meters): 3289955.0
** UTM Zone: 15 Datum: NAD83
** Study radius (km) for surface roughness: 1.0
** Airport? N, Continuous snow cover? N
** Surface moisture? Wet, Arid region? N
** Month/Season assignments? Default
** Late autumn after frost and harvest, or winter with no snow: 12 1 2
** Winter with continuous snow on the ground: 0
** Transitional spring (partial green coverage, short annuals): 3 4 5
** Midsummer with lush vegetation: 6 7 8
** Autumn with unharvested cropland: 9 10 11
**

FREQ_SECT	ANNUAL	1			
SECTOR	1	0	360		
**		Sect	Alb	Bo	Zo
SITE_CHAR	1	1	0.17	0.68	0.375

APPENDIX F

MODELING SOURCE PARAMETERS AND EMISSION RATES

Modeled Source ID	Modeled Source Description	Emission Rate ^[1] Hr & 24-Hr (lb/hr)		PM ₁₀ /PM _{2.5} ^[2] 24-Hr & Annual (g/s) (lb/hr)	
EPN104	Unit No. 2 Sta	01	1.13	3.181E-01	2.52
CATSCNR2	Catalyst Screening for Reg		--	8.284E-04	6.57E-03

[1] Modeled Emissions for EPN 104

[2] Modeled Emissions for EPN 104

DOWNWASH STRUCTURE HEIGHT

TABLE F-2. Downwash Structure Heights

Building No.	Description	Height (m)
TK49	Tank 49	9.14
TK55	Tank 55	9.14
TK77	Tank 77	9.45
TK24	Tank 24	9.14
TK56	Tank 56	9.14
TK48	Tank 48	9.14
CONV1	Converter	13.72
CONV2	Converter	19.81
OLEUM	Oleum Tower	9.68
ABSTWR	Absorbing Tower	10.67
BRINKS	Brinks vessel	8.53
TK23	Tank 23	9.14
TK25	Tank 25	9.14
TK32	Tank 32	9.14
DRYTWR	Drying Tower	10.67
S2	Sulphur Tank S2	9.60
S1	Sulphur Tank S1	9.30
DRYTWR2	Drying Tower	10.67
ABSTWR2	Absorbing Tower	10.67
OLEUM2	Oleum Tower	10.97
TK78	Spent Acid Tank 78	9.45
F1	F1 Tank	9.75
F2	F2 Tank	9.75
F3	F3 Tank	9.75
CT1	Cooling Tower 1	12.19
CT2	Cooling Tower 2	12.19
CT3	Cooling Tower 3	12.19
QUENCH	Quench Tower	13.11
DCGC	DCGC	19.51
ESP1	ESP1	14.33
ESP2	ESP2	14.33
TK53	Tank 53	9.14
TK76	Tank 76	9.14
TK2	Tank 2	8.84
TK10	Tank 10	9.45
TK31	Tank 31	9.14
TK12	Tank 12	9.14
TK11	Tank 11	9.14
TK18	Tank 18	7.32
TK14	Tank 14	9.14
TK15	Tank 15	9.14
CIVIL	Structural and Civil Building	11.53
WAREHSE	Warehouse	6.43
ADF	ADF Storage	15.88
SHOP1	Office and Area 1 Shop	6.25
AWT	AWT Building	8.61
UNLOAD	Truck Unloading	8.15
SAFEROOM	Safety Equip. Room	6.10
WHB	Waste Heat Boiler	11.58
STMDRUM	WH Boiler Steam Drum	15.24

TABLE F-2. Downwash Structure Heights

Building No.	Description	Height (m)
LAB	Consolidated Lab	7.75
MAINT	Maintenance Office	7.06
OFFICE	Office	7.09
TEX	Tex Ultra Pure	18.49
UNOFF	Old Lab	6.05
UNBLD1	65% building	8.53
UNBLD2	65% storage	7.70
NEHOUSE	North-East Warehouse	6.71
SAFETY	Safety Building	4.27
CT7	No. 7 Cooling Tower	10.26
GEAR	Switch Gear and Compressor	9.14
TURBO	Turbo Generator	9.14
CTRL	Control Room	5.94
CTGE	G. E. Cooling Tower	13.46
FURNACE	Furnace	7.98
BLD24	No. 8 Cooling Tower	14.94
BLD27	Building under AT and DT	6.25
BLD29	Building under OT	3.05
BLD30	Fin Fan A	4.57
BLD31	Fin Fan B	4.57
BLD32	Fin Fan C	4.57
BLD89	Building Under Oleum Tower	4.88
BLD91	Denim Building	12.19
BLD92	Turbo Gen	14.94
BLD1	Pop-dock building	24.38
TK1_N		10.28
TK2_N		10.28
TK3_N		10.28
BLD1_N		4.73
BLD2 N		3.20

ELECTRONIC FILES

APPENDIX G

EXCERPTS FROM CONSENT DEGREE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

FILED

2007 APR 26 AM 11:20

STEPHEN R. HARRIS, CLERK
U.S. DISTRICT COURT
FOR THE NORTHERN DISTRICT
OF INDIANA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RHODIA INC.,

Defendant.

Civil Action No.

2:07CV134WL

COMPLAINT

The United States of America, by authority of the Attorney General of the United States and through the undersigned attorneys, acting at the request of the Administrator of the United States Environmental Protection Agency (EPA), alleges:

NATURE OF THE ACTION

1. This is a civil action brought against Rhodia Inc. (Rhodia or Defendant) pursuant to Section 113(b) of the Clean Air Act (the Act), 42 U.S.C. § 7413, for injunctive relief and civil penalties for violations at Rhodia's eight sulfuric acid plants nationwide of Part C of Title I of the Act, 42 U.S.C. §§ 7470-7492, the Prevention of Significant Deterioration (PSD) provisions of the Act; Part D of Title I of the Act 42 U.S.C. §§ 7501-7515, the non-attainment New Source Review (nonattainment NSR) provisions of the Act; certain New Source Performance Standards (NSPS) promulgated under Section 111 of the Act, 42 U.S.C. § 7411; the Title V Permit requirements of the Act, 42 U.S.C. § 7661; and the federally enforceable State Implementation Plans (SIPs) for Indiana, Louisiana, Texas and California approved by EPA pursuant to Section 110 of the Act, 42 U.S.C. § 7410, which incorporate and/or implement the above-listed federal

penalties owed by Rhodia to the State of Indiana shall be paid twenty percent (20%) to the State of Indiana and eighty percent (80%) to the City of Hammond; and

d. \$333,333.50 to the Bay Area Air Quality Management District. Payment of the civil penalties and of any stipulated penalties owed to the Bay Area Air Quality Management District shall be made by check made payable to the Bay Area Air Quality Management District and sent to Bay Area Air Quality Management District, Office of District Counsel, Brian C. Bunger, Esq., District Counsel, 939 Ellis Street, San Francisco, California 94109.

V. COMPLIANCE REQUIREMENTS

11. Emission Limits

a. Hammond: By the Effective Date specified in Paragraph 11.i., below, the Hammond sulfuric acid plant shall meet the following SO₂ emission limits:

i. A Long-Term Limit of 2.50 lbs/ton.

Defendant shall commence monitoring as of the Effective Date.

Defendant shall have until 365 days after the Effective Date to demonstrate compliance with this Long-Term Limit;

ii. A Short-Term Limit of 3.50 lbs/ton;

b. Martinez: By the Effective Date specified in

Paragraph 11.i., below, the Martinez sulfuric acid plant shall meet the following SO₂ emission limits:

- i. A Long-Term Limit of 2.20 lbs/ton.

Defendant shall commence monitoring as of the Effective Date.

Defendant shall have until 365 days from the Effective Date to demonstrate compliance with this Long-Term Limit;

- ii. A Short-Term Limit of 3.00 lbs/ton.

c. Dominguez: By the Effective Date specified in Paragraph 11.i., below, the Dominguez sulfuric acid plant shall meet the following SO₂ emission limits:

- i. Comply with the applicable annual SO₂ allocation as determined by the South Coast Air Quality Management District's Regional Clean Air Incentives Market (RECLAIM), as defined in Regulation XX of the South Coast Air Quality Management District Rules;

- ii. A Short-Term Limit of 3.50 lbs/ton.

d. Houston #8: By the Effective Date specified in Paragraph 11.i., below, the Houston #8 sulfuric acid plant shall meet the following SO₂ emission limits:

- i. A Long-Term Limit of 1.70 lbs/ton.

Defendant shall commence monitoring as of the Effective Date.

Defendant shall have until 365 days from the Effective Date to

demonstrate compliance with this Long-Term Limit;

ii. A Short-Term Limit of 3.00 lbs/ton.

e. Baytown Facility: By the Effective Date specified in Paragraph 11.i., the Baytown sulfuric acid plant shall meet the following SO₂ emission limits:

i. A Long-Term Limit of 2.20 lbs/ton.

Defendant shall commence monitoring as of the Effective Date.

Defendant shall have until 365 days from the Effective Date to demonstrate compliance with this Long-Term Limit;

ii. A Short-Term Limit of 3.00 lbs/ton.

f. Baton Rouge #2: By the Effective Date specified in Paragraph 11.i., the Baton Rouge #2 sulfuric acid plant shall meet the following SO₂ emission limits:

i. A Long-Term Limit of 2.20 lbs/ton.

Defendant shall commence monitoring as of the Effective Date.

Defendant shall have until 365 days from the Effective Date to demonstrate compliance with this Long-Term Limit;

ii. A Short-Term Limit of 3.00 lbs/ton.

g. Baton Rouge #1: Beginning on the Effective Date specified in Paragraph 11.i., the Baton Rouge #1 sulfuric acid plant shall meet the following SO₂ emission limits:

i. A Long-Term Limit of 1.90 lbs/ton.

Defendant shall commence monitoring as of the Effective Date.

Defendant shall have until 365 days from the Effective Date to demonstrate compliance with this Long-Term Limit;

ii. A Short-Term Limit of 3.00 lbs/ton.

h. Houston #2: Beginning on the Effective Date specified in Paragraph 11.i., the Houston #2 sulfuric acid plant shall meet the following SO₂ emission limits:

i. A Long-Term Limit of 1.80 lbs/ton.

Defendant shall commence monitoring as of the Effective Date.

Defendant shall have until 365 days from the Effective Date to demonstrate compliance with this Long-Term Limit;

ii. A Short-Term Limit of 3.00 lbs/ton.

i. Effective Dates for Emission Limits: The Effective Dates for each emission limit specified in Paragraph 11.a. through 11.h., are as follows:

i. Hammond: July 1, 2007

ii. Martinez: July 1, 2007

iii. Dominguez: July 1, 2007

iv. Baytown: January 1, 2009

v. Houston #8: July 1, 2009

vi. Baton Rouge #2: January 1, 2011

vii. Baton Rouge #1: May 1, 2012

viii. Houston #2: April 1, 2014.

j. NSPS Applicability: Not later than the Effective Date for achieving the applicable SO₂ emission limits specified in Paragraphs 11.a. through 11.i., each sulfuric acid plant shall be considered an affected facility for purposes of the New Source Performance Standard (NSPS) 40 C.F.R. Part 60, Subpart H. Not later than the applicable Effective Date, each sulfuric acid plant covered by this Consent Decree shall comply with all applicable requirements for affected facilities under the NSPS 40 C.F.R. Part 60, Subparts A and H, or the Consent Decree if more stringent. Notices and other obligations set forth in this Consent Decree shall be deemed to satisfy all applicable initial notification and compliance demonstration requirements of NSPS Subparts A and H.

k. Acid Mist Limits: Not later than the effective date of this Consent Decree, each of the sulfuric acid plants shall comply with the NSPS, Subpart H sulfuric acid mist emission limitation of 0.15 lbs/ton of 100% sulfuric acid produced, as set forth at 40 C.F.R. § 60.83(a)(1). Compliance with this limit is to be demonstrated using the performance test required by paragraph 14 of this Consent Decree.

l. Best Practices: Consistent with 40 C.F.R.

§ 60.11(d), at all times, including periods of Startup, Shutdown, and Malfunction, Defendant shall, to the extent practicable, maintain and operate each of its sulfuric acid plants, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions.

m. Scrubber Design: All new scrubbers installed pursuant to this Consent Decree and used for SO₂ control at any of the sulfuric acid plants shall be designed to achieve at least 95% removal efficiency, except during periods of Startup, Shutdown and Malfunction.

12. Interim Emission Limits: Upon the effective date of this Consent Decree and until the Effective Date of the SO₂ emission limits specified in Paragraph 11.d., 11.f., 11.g., 11.h., for the Houston # 8, Baton Rouge #2, Baton Rouge #1, and Houston #2 sulfuric acid plants, Defendant shall comply with an interim SO₂ emission limit at each of these sulfuric acid plants. The interim SO₂ emission limit for each of these sulfuric acid plants shall be the permit limit in place at the time of the effective date of this Consent Decree or the currently applicable State Implementation Plan emission limit for SO₂, whichever is more stringent.

13. Continuous Emissions Monitoring System:

a. At each of its sulfuric acid plants, no later than the Effective Date of each SO₂ emission limit established under Paragraph 11.a. through 11.i., Defendant shall install and make operational a SO₂ continuous emissions monitoring system (CEMS). Except during CEMS breakdowns, repairs, calibration checks, and zero span adjustments, the CEMS shall be operated during all sulfuric acid plant Operating Hours, and shall be used at each sulfuric acid plant to demonstrate compliance with the SO₂ emission limits established in Paragraph 11 of this Consent Decree. The SO₂ CEMS shall meet the following requirements:

i. The SO₂ CEMS shall monitor and record the 3-hour arithmetic average (not weighted by production volume) SO₂ emission rate from each sulfuric acid plant in units of lbs per ton of 100% acid produced;

ii. Except for the Dominguez facility, the SO₂ CEMS shall monitor and record the SO₂ emission rate from each sulfuric acid plant averaged (arithmetic average, not weighted by production volume) over all Operating Hours in each rolling 365-day period in units of lbs per ton of 100% acid produced; and

iii. The CEMS shall be installed, certified, calibrated, maintained, and operated in accordance with the applicable requirements of 40 C.F.R. §§ 60.11, 60.13, Part 60, Appendix B Performance Specification 2, and Part 60 Appendix F Procedure 1, except as otherwise provided in this Consent Decree or as provided in the approved Alternative Monitoring Plans described in Paragraph 13.b below. If an O₂ monitor is necessary, it shall meet 40 C.F.R. Part 60, Appendix B Performance Specification 3.

b. Defendant has submitted an Alternative Monitoring Plan for each of its Facilities that describes how Defendant proposes to implement the monitoring requirements of this Paragraph, including the methodology Defendant proposes to use to demonstrate compliance in the event of CEMS downtime lasting longer than 24 hours. Monitoring methods specified in this Consent Decree have been approved as appropriate alternative monitoring methods for purposes of NSPS, per 40 C.F.R.

§ 60.13(i). The Alternative Monitoring Plans are included as Appendix A. These plans supersede the corresponding SO₂ monitoring requirements of the NSPS and the applicable SO₂ monitoring requirements of the State Parties. Defendant shall implement the Alternative Monitoring Plans in the States of the

State Parties upon installation of the SO₂ CEMS at each of the sulfuric acid plants. In the States that are not State Parties (as well as in the South Coast Air Quality Management District), Defendant shall either reach agreement with those States to follow the Alternative Monitoring Plans in lieu of those States' SO₂ monitoring requirements, or else conduct SO₂ monitoring in compliance with those States' laws and regulations, in lieu of compliance with the Alternative Monitoring Plans.

c. Defendant shall take all steps necessary to avoid CEMS breakdowns and minimize CEMS downtime. This shall include, but is not limited to, operating and maintaining the CEMS in accordance with best practices and maintaining an on-site inventory of spare parts or other supplies necessary to make rapid repairs of the equipment.

d. In the event of CEMS downtime lasting longer than 24 hours, Defendant shall demonstrate compliance with the applicable emission limits in Paragraph 11 according to the procedures specified in the Alternative Monitoring Plans referenced in Paragraph 13.b. above.

14. Performance Testing

a. By no later than 120 days after the effective date of this Consent Decree, Defendant shall conduct an initial

APPENDIX H

ALTERNATE MONITORING PLAN

**Alternative Monitoring Plan for SO₂ Emissions
Rhodia Inc. Houston, TX Unit 2
Single Absorption Sulfuric Acid Regeneration Plant with Scrubber**

Justification for Using an Alternative Monitoring Plan (AMP) for SO₂ emissions

The regulations that established the NSPS for sulfuric acid plants are over 30 years old. At the time, the regulatory standard was established as 4 lb of SO₂ emissions per ton of 100 % sulfuric acid produced, and compliance with the standard was to be demonstrated using a calculation similar to Equation 1 below. Regulations required the use of a CEMS to measure SO₂ concentration at the stack (M2), but only required measurement of SO₂ entering the converter by suitable method three times per calendar day. Plants typically rely on the use of a Reich test once per shift to establish the SO₂ concentration entering the converter (M1). While the stack measurement represented a nearly continuous real time indication of the stack concentration, performing a Reich test once per shift for the converter inlet concentration provides little more than a random sample once every eight hours.

The methodology proposed in this AMP will provide a more continuous real-time indication of compliance by using a process analyzer to measure the converter inlet SO₂ concentration. While this analyzer will be nearly identical to the CEMS that is commonly used at the stack, it will not be able to meet all of the standards that are usually applied to a CEMS because of the process conditions and / or physical limitations of an existing facility. For example, it is not feasible to modify the existing ductwork around the analyzer to meet the normal guidelines for straight runs of pipe upstream / downstream of the analyzer. We believe that the disadvantages (places where the analyzer is not quite up to CEMS standards) are far outweighed by the advantages of using a real time instrument, rather than a periodic Reich test, to measure the converter inlet concentration. Rhodia will use best professional judgment to ensure the analyzer located at the converter inlet provides representative data.

Except as noted in this document, the objective of this proposed AMP is to maintain the process analyzer at the converter inlet in a manner that is similar to the stack CEMS, as set forth in 40 CFR Part 60, Appendix B and F.

Definitions

"CEMS" or "Continuous Emission Monitoring System" shall mean equipment that continuously measures and records the concentration and/or emission rate of a pollutant, in the units specified by the emission limit concerned.

"Long-Term Limit" shall mean a sulfur dioxide (SO₂) emission limit for a sulfuric acid plant expressed as pounds per ton of 100% sulfuric acid produced ("lbs/ton"), averaged over all Operating Hours in a rolling 365-day period.

"Malfunction" shall mean, consistent with 40 C.F.R. § 60.2, any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner, but shall not include failures that are caused in part by poor

maintenance or careless operation.

"Operating Hours" shall mean periods during which sulfur or sulfur-bearing compounds, excluding conventional fossil fuels such as natural gas or fuel oil, are being fed to the furnace.

"Short-Term Limit" shall mean the SO₂ emission limit for each sulfuric acid plant expressed as pounds per ton of 100% sulfuric acid produced ("lbs/ton"), averaged over each rolling 3-hour period. Except for periods of Startup, Shutdown and Malfunction, the Short-Term Limits established under this Consent Decree shall apply at all times.

"Shutdown" shall mean the cessation of operation of a sulfuric acid plant for any reason. Shutdown begins at the time sulfur or sulfur-bearing feeds, excluding conventional fossil fuels such as natural gas or fuel oil, to the furnace ceases.

"Startup" shall mean the 24-hour period at any sulfuric acid plant beginning when the feed of sulfur or sulfur-bearing materials, excluding conventional fossil fuels such as natural gas or fuel oil, to the furnace commences after a main gas blower shutdown.

Pt. 60.84 Emissions Monitoring.

Compliance with the Long-Term Limit and Short-Term Limit defined by the Consent Decree will be demonstrated using SO₂ analyzers at the converter inlet and exit stack using the following equation. Refer to additional discussion below the equation for specific details related to data input and calculation.

Equation 1

$$Xe = (M1 - M2) / (M1 - 1.5 \times M1 \times M2)$$

$$E = (K / Xe) - K$$

Where:

Xe = fractional conversion efficiency

M1 = fractional concentration of SO₂ entering the converter

M2 = fractional concentration of SO₂ at the stack

E = SO₂ emission rate in lb / ton of 100 % acid produced

K = 1306 = (2000 lb / ton) x (64 lb / lbmol SO₂) / (98 lb / lbmol H₂SO₄)

Short-Term Limit

The following procedure and calculation will be performed once every five minutes during all Operating Hours, except periods of Startup, Shutdown or Malfunction, to demonstrate compliance with the Short-Term Limit for SO₂.

- At any given time the system will maintain an array consisting of the 36 most recent samples of the SO₂ concentrations at the converter inlet and at the exit stack.

- Once every five minutes, the system will sample the latest SO₂ concentrations, add the recent readings to the array and delete the oldest readings. If the unit is not operating then the array of data will not change.
- M1_{3hravg} will then be calculated as the arithmetic average of the 36 most recent data samples for the fractional concentration of SO₂ entering the converter (M1_{3hravg}).
- M2_{3hravg} will then be calculated as the arithmetic average of the 36 most recent data samples for the fractional concentration of SO₂ at the stack (M2_{3hravg}).
- The rolling 3 hour average SO₂ emissions (E_{3hravg}) will then be calculated per Equation 2.

Equation 2 (rolling 3 hour average SO₂ emissions)

$$Xe_{3hravg} = (M1_{3hravg} - M2_{3hravg}) / (M1_{3hravg} - 1.5 \times M1_{3hravg} \times M2_{3hravg})$$

$$E_{3hravg} = (K / Xe_{3hravg}) - K$$

- The production unit will be deemed to be operating in compliance with the Short Term Limit if E_{3hr-avg} does not exceed 3.0 lb of SO₂ per ton of 100% sulfuric acid produced during all Operating Hours except periods of Startup, Shutdown or Malfunction.

During routine calibration checks and adjustments of the SO₂ monitors, the SO₂ measurement will be "frozen" at its pre-calibration level. Refer to System Maintenance and Malfunction for guidance during CEMS malfunctions, breakdowns, and repairs.

Long-Term Limit

The following method will be used to calculate the daily average lb of SO₂ per ton of 100% sulfuric acid, and the number of Operating Hours for the calendar day.

- Once every five minutes during all Operating Hours, the SO₂ concentrations (converter inlet and exit stack) will be sampled and this time will be counted as five operating minutes. If the unit is not operating, then the SO₂ concentrations will not be sampled.
- The daily average will be calculated as follows for each calendar day:
 - o M1_{daily avg} will be calculated as the arithmetic average of the sample population for the fractional concentration of SO₂ entering the converter.
 - o M2_{daily avg} will be calculated as the arithmetic average of the sample population for the fractional concentration of SO₂ at the stack
 - o E_(daily avg) will then be calculated using Equation 3.

Equation 3 (daily average SO₂ emissions)

$$Xe_{daily avg} = (M1_{daily avg} - M2_{daily avg}) / (M1_{daily avg} - 1.5 \times M1_{daily avg} \times M2_{daily avg})$$

$$E_{daily avg} = (K / Xe_{daily avg}) - K$$

- o The number of operating minutes for the day will be summed (T_{day} ,)
- o E_{dayavg} and T_{day} will be used to calculate a 365-day rolling average of lb/ton. The daily averages will be weighted by the number of operating minutes per day, as per Equation 4.

Once the system has been in operation for 365 days, compliance with the Long Term Limit (365-day rolling average) SO₂ emission rate will be calculated using Equation 4.

Equation 4

$$E_{365avg} = \frac{\sum [E_{dayavg} * T_{day}]}{\sum T_{day}}$$

The production unit will be deemed to be operating in compliance with the Long-Term Limit if E_{365avg} does not exceed 1.8 lb of SO₂ per ton of 100% sulfuric acid produced during all Operating Hours

During routine calibration checks and adjustments of the SO₂ monitors, the SO₂ measurement will be "frozen" at its pre-calibration level. Refer to System Maintenance and Malfunction for guidance during CEMS malfunction, breakdowns, and repairs:

Pt. 60.84 Emissions Monitoring Pt. 60, App. B, Spec. 2, Section 6.0 (Stack and Converter Inlet Analyzers)

Rhodia proposes to use the following stack analyzer specifications to satisfy the requirements of Pt. 60.84 and Pt. 60, App. B, Spec. 2, Section 6.0. The stack analyzer span must be capable of accommodating elevated emissions during startup. Specifications for the analyzer located at the converter inlet are based on Rhodia's experience with process analyzers at these locations.

An equivalent analyzer may be substituted for any reason.

Location	Manufacturer	Model Number	Range
Stack	Ametek Photometric Analyzer (or equivalent)	920 (or equivalent)	Dual range: Normal: 0 – 500 ppm SO ₂ SSM: 0 – 3,600 ppm SO ₂
Converter Inlet	Ametek Photometric Analyzer (or equivalent)	920 or IPS-4 (or equivalent)	Single range: 0 – 15 % SO ₂

Pt. 60, App. B, Spec. 2, Section 1.0 (Stack and Converter Inlet Analyzers)

Initial compliance certification required only if the analyzer is replaced or if system modifications require one to be performed. Additional detail and exceptions noted below under System Modifications below.

Pt. 60, App. B, Spec. 2, Section 8.0 (Converter Inlet Analyzer)

Rhodia will select the optimum location to obtain representative SO₂ readings from this location. Turbulence near the blower exit and elevated temperature at the converter inlet may require an analyzer measurement location that differs from the requirements of this section (e.g. pollutant stratification). A pollutant stratification test is not warranted for this application because (a) process conditions make it extremely unlikely that stratification could occur, and (b) the samples obtained under this monitoring plan are the same as would be obtained under the NSPS, except that the

instrument will typically take 288 samples per day rather than the 3 required by the NSPS. Therefore, no new stratification risk is introduced by this method, but the instrument will typically take about 100 times as many samples.

Pt. 60, App. B, Spec. 2, Section 16.0 (Converter Inlet Analyzer)

Rhodia will use the Alternative Relative Accuracy Procedure provided in Section 16.2.1 (i.e. conduct a cylinder gas audit).

Pt. 60, App. F, Spec. 2, Section 5.0 (Converter Inlet Analyzer)

Rhodia will use quarterly cylinder gas audits (i.e. four per year) to satisfy the requirements of this section.

System Maintenance and Malfunction

Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the plant shall conduct monitoring in continuous operation during all Operating Hours as defined above

In the event of a CEMS malfunction of greater than 24 hours:

- Exit stack gas will be sampled and analyzed at least once per hour, during all Operating Hours. Sampling will be conducted by Reich test or other method (e.g. portable analyzer).
- Converter inlet gas will either be sampled, or estimated using engineering judgment, at least once every four hours during all Operating Hours.
- Compliance with the Short-Term Limit and Long-Term Limit shall be verified by using these data and Equations 2, 3, and 4 with the following exceptions. If the stack CEMS is out of service, the most recent hourly reading will be substituted for the 12 five-minute readings that would otherwise be taken if the system was operating normally. Similarly, if the converter inlet SO₂ analyzer is out of service, the most recent four-hour reading will be substituted for the 48 five-minute readings that would otherwise be taken if the system was operating normally.

In the event of an analyzer malfunction, a like-kind replacement may be used while repairs are being made. A cylinder gas audit (CGA) must be performed on the replacement analyzer as soon as is practicable after it is placed in service. The daily calibration drift requirement would also apply to the replacement analyzer.

System Modifications

Significant replacement, modification, or change in certified CEMS equipment may require a complete recertification. If a recertification is required, it will be conducted within 90 days. Examples include:

- Change in location or orientation of the sampling probe or site
- Complete replacement of an existing continuous emission monitoring system.

When replacing components that can alter the physical characteristics or conditioning of the sample in the field, a CGA is required. The following activities will require a CGA to be performed before returning the analyzer to service.

- Replacement of the analyzer
- Detector replacement
- Replacement of equipment associated with the detector

The following activities are not expected to trigger a CGA. However, it is recommended that a Calibration Drift check be performed before returning to service.

- Filter replacement
- Data Recorder Repairs
- Tubing replacement

General guidance: When replacing components or devices that do not affect the physical characteristics or handling of the gas in the field such as data recorders, a CGA is not required. A calibration drift check normally should be conducted. If the repaired component affects the transport of the gas to the analyzer, such as replacing tubing, a leak check should be conducted.

Alternative Monitoring System

The monitoring system proposed in this Alternative Monitoring Plan is expected to be a significant improvement over the monitoring requirements contained in the NSPS for sulfuric acid plants. However, the real-time calculation of SO₂ emissions is dependent upon the use of an SO₂ analyzer in the inlet duct to the converter, and the maintenance of that analyzer to approximately the same performance standards normally applied to the stack SO₂ CEMS. This is an unproven application of this technology, and there is some risk that the converter inlet SO₂ analyzer will not be able to perform as required despite the best efforts of Rhodia and the instrument manufacturer.

If Rhodia and the instrument manufacturer are unable to make the system operate to the indicated standards because the converter inlet SO₂ analyzer is unreliable and / or inaccurate in this application, then Rhodia will promptly notify EPA Region 6, and TCEQ of its determination and proceed as follows:

- Rhodia will immediately begin meeting its SO₂ emissions monitoring requirements in accordance with 40 CFR Part 60, Subpart H, except that the SO₂ concentration at the converter inlet will be analyzed six times per day rather than the three times per day specified in the regulations.
- Rhodia will provide whatever information is requested by EPA regarding the determination that the converter inlet SO₂ analyzer can not meet the necessary performance standards.
- Rhodia will work with EPA to determine whether real time measurement of SO₂ emissions (in lbs / ton of acid) can be readily accomplished through other means without the use of an SO₂ analyzer at the converter inlet.

AIR, PESTICIDES, AND TOXICS 6TH FLOOR RECORDS CENTER INFILING / NEW FILE FORM

New File ☐

OR

Infiling ☒

Choose from the file types below:

AIR FACILITY:

- ☐ AR - Acid Rain
☐ CB - Confidential Business
☐ CO - Compliance
☐ EN - **Enforcement
☐ GE - General
☒ PE - Permit
☐ RA - Regulatory Applicability
☐ Other _____

TSCA:

- ☐ AH - Asbestos Hazard Emergency Response Act
☐ AS or AW - Asbestos or Asbestos Worker Protection
☐ CB - Confidential
☐ FI - Site Specific
☐ FO - Non Site Specific
☐ IM - **Section 5 & 8
☐ LB - **Lead
☐ PC - **PCB

** Extension of file type (if needed): ☐ ES - Enforcement Sensitive
☐ DO - Docket Number

EPCRA/SARA ☐**FIFRA** ☐*EPA Registry I.D.*

Current FRS Number:
 (Found in EnviroFacts)

110000460901

Facility Name & Physical Address:

*Rhodia Houston Plant**8615 Manchester St,**Houston, TX. 77012 2142*

Remarks:

Requestor's Name & Phone Number:

Les Koval X6733

Program Management Files:

A current listing of these file types and their numeric codes are located in a blue binder on the top shelf of the "APT" file cabinet in the 9th Floor Records Center.

AIRS - Aerometric Information Retrieval System

ATO - Air Toxics

EMR - Emergency Response

ENF - Enforcement -

ENF 5-5-1 requires Month and Fiscal Year accompany file code.

ENF 5-6-5 requires Fiscal Year accompany file code.

EXR - External Relations

GEO - Geographical Summary Data

GRA - Grants Administration

The majority of this section requires the Fiscal Year accompany file code.

Project Officer Grants require the Grant number and Fiscal Year accompany file code.

LAB - Laboratory Support

LBP - Lead Based Paint

LBP 12-3 requires the facility name in which document refers to be either highlighted or circled on the top page.

LEL - Legal and Legislative

MON - Monitoring NES - National Emission Standards

NSP - New Source Performance

NSR - New Source Review

OPP - Operating Permits Program

PEA - Permits Administration Program

PES - Pesticides

PLA - Planning

PUA - Public Affairs

RAD - Radiation

RCR - Resource Conservation and Recovery Act - Regulatory Development

RDE - Research and Development

REG - Registration

SIP - State Implementation Plan

SUP - Superfund

TITL - Title III

TSC - Toxic Substance Control

TSC 1-1-4 requires the facility name in which document refers to be either highlighted or circled on the top page.

TSU - Technical Support

VRP - Voluntary Reduction Program

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



EPA

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 22, 2011

MR FLOYD DICKERSON
ENVIRONMENTAL MANAGER
RHODIA INC
8615 MANCHESTER ST
HOUSTON TX 77012-2142

Re: Permit Amendment Application
Permit Number: 19282
No. 8 Sulfuric Acid Unit
Houston, Harris County
Regulated Entity Number: RN100220581
Customer Reference Number: CN600125330
Account Number: HG-0697-O
Associated Permit Number: PSDTX1081

RECEIVED
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AIR PERMITS SECTION
6PD-R

Dear Mr. Dickerson:

This is in response to your letter received August 1, 2011 and your Form PI-1 (General Application for Air Preconstruction Permits and Amendments) concerning the proposed amendment to Permit Number 19282. We understand you propose to include planned maintenance, startup and shutdown activities and emissions and authorize existing particulate matter emissions into the permit for the first time.

As indicated in Title 30 Texas Administrative Code § 116.116(b) [30 TAC § 116.116(b)], and based on our review, Permit Number 19282 is hereby amended. This information will be incorporated into the existing permit file. Enclosed are revised special conditions pages and a maximum allowable emission rates (MAERT) table to replace those currently attached to your permit. We appreciate your careful review of the special conditions of the permit and assuring that all requirements are consistently met.

Planned maintenance, startup, and shutdown for the sources identified on the MAERT have been reviewed and included in the MAERT and specific maintenance activities are identified in the permit special conditions. Any other maintenance activities are not authorized by this permit and will need to obtain separate authorization.

Mr. Floyd Dickerson
Page 2
November 22, 2011

Re: Permit Number: 19282

This amendment will be automatically void upon the occurrence of any of the following, as indicated in 30 TAC § 116.120(a):

1. Failure to begin construction of the changes authorized by this amendment within 18 months from the date of this authorization.
2. Discontinuance of construction of the changes authorized by this amendment for a period of 18 consecutive months or more.
3. Failure to complete the changes authorized by this amendment within a reasonable time.

Upon request, the executive director may grant extensions as allowed in 30 TAC § 116.120(b).

As of July 1, 2008, all analytical data generated by a mobile or stationary laboratory in support of compliance with air permits must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory under the Texas Laboratory Accreditation Program or meet one of several exemptions. Specific information concerning which laboratories must be accredited and which are exempt may be found in 30 TAC § 25.4 and § 25.6.

For additional information regarding the laboratory accreditation program and a list of accredited laboratories and their fields of accreditation, please see the following Web site:

www.tceq.texas.gov/compliance/compliance_support/qa/env_lab_accreditation.html

For questions regarding the accreditation program, you may contact the Texas Laboratory Accreditation Program at (512) 239-3754 or by e-mail at labprgms@tceq.texas.gov.

You may file a **motion to overturn** with the Chief Clerk. A motion to overturn is a request for the commission to review the executive director's decision. Any motion must explain why the commission should review the executive director's decision. According to 30 TAC § 50.139, an action by the executive director is not affected by a motion to overturn filed under this section unless expressly ordered by the commission.

A motion to overturn must be received by the Chief Clerk within 23 days after the date of this letter. An original and 11 copies of a motion must be filed with the Chief Clerk in person, or by mail to the Chief Clerk's address on the attached mailing list. On the same day the motion is transmitted to the Chief Clerk, please provide copies to the applicant, the executive director's attorney, and the Public Interest Counsel at the addresses listed on the attached mailing list. If a motion to overturn is not acted on by the commission within 45 days after the date of this letter, then the motion shall be deemed overruled.

Mr. Floyd Dickerson
Page 3
November 22, 2011

Re: Permit Number: 19282

You may also request **judicial review** of the executive director's approval. According to Texas Health and Safety Code § 382.032, a person affected by the executive director's approval must file a petition appealing the executive director's approval in Travis County district court within 30 days after the effective date of the approval. Even if you request judicial review, you still must exhaust your administrative remedies, which includes filing a motion to overturn in accordance with the previous paragraphs.

Your cooperation in this matter is appreciated. If you need further information or have any questions, please contact Mr. Stephen Anderson, P.E. at (512) 239-1287 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,



Michael Wilson, P.E., Director
Air Permits Division
Office of Air
Texas Commission on Environmental Quality

MPW/SEA

Enclosures

cc: Air Section Manager, Region 12 – Houston
Director, Environmental Public Health Division, Harris County Public Health and
Environmental Services, Pasadena
Bureau Chief Pollution Control & Prevention, Environmental Health Division, Houston
Department of Health and Human Services, Houston
Air Permits Section Chief, New Source Review, Section (6PD-R), U.S. Environmental
Protection Agency, Region 6, Dallas

Project Number: 168535



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SPECIAL CONDITIONS

Permit Numbers 19282 and PSDTX1081

Emission Standards

1. This permit authorizes emissions only from those points listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating conditions specified in this permit.
2. Sulfur dioxide (SO₂) emissions limits will be limited to the following emission rates:
Short term - 3.0 pounds of SO₂ per ton of one hundred percent acid produced.
Long term - 1.7 pounds of SO₂ per ton of one hundred percent acid produced.

These values correlate to hourly and yearly SO₂ emission rates found in the maximum allowable emissions rates table (MAERT) from Emission Point Number (EPN) 101. (PSD) (01/08)

These facilities shall comply with all applicable requirements shall comply with all applicable requirements of EPA regulations on Standards of Performance for New Stationary Sources promulgated for the following: (11/11)

- A. Emission Guidelines and Compliance Times for Sulfuric Acid Production Units in 40 CFR Part 60, Subparts A and Cd, and
- B. Sulfuric Acid Plants in 40 CFR Part 60, Subparts A and H.

The sulfur acid mist (H₂SO₄) mist limits are limited to 0.15 pound per ton of H₂SO₄ EPN 101. SO₂ and H₂SO₄ mist emission limits effective on and after July 1, 2009 shall never be relaxed. (PSD) (12/07)

Natural gas use for furnace heat ups are limited to 150 hours per rolling 12 months at a maximum hourly fired duty of 50 MMBtu and shall be emitted through EPNs 103, 105 and 106. Records shall be kept at the plant site and updated once every six months to demonstrate compliance with this representation. Records shall be made readily available to Texas Commission on Environmental Quality (TCEQ) personnel upon request, the U.S. Environmental Protection Agency (EPA) personnel or any applicable local program with jurisdiction. (11/11)

3. H₂SO₄ production is limited to 2,600 tons per day. The holder of this permit shall keep records of the daily production of H₂SO₄. Records shall be made readily available to TCEQ personnel upon request, EPA personnel or any applicable local program with jurisdiction and may be used to determine compliance with the SO₂ emissions limitations specified in the MAERT. (PSD) (04/10)

SPECIAL CONDITIONS

Permit Numbers 19282 and PSDTX1081

Page 2

4. Piping, Valves, Flanges, Connectors, Pumps and Compressors in Gaseous and Liquid Sulfur Dioxide (SO₂) Service (12/07)

- A. Audio, olfactory and visual checks for gas and liquid SO₂ leaks within the operating area shall be made once every shift. This special condition will apply upon start-up of the represented increase in H₂SO₄ production from the October 2006 amendment submittal.
- B. Process gas leaks shall be addressed upon detection of a gaseous SO₂ leak by plant personnel who shall take the following actions:
- (1) Locate and determine the extent of the process gas leak.
 - (2) Commence to make repairs to the gas leak.
 - (3) Use a leak collection/containment system to prevent the leak until repair or replacement can be made if immediate repair is not possible.
- C. Liquid leaks found in damaged or leaking valves, connectors and pump seals in the SO₂ scrubber authorized in the October 2006 amendment submittal found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Every reasonable effort shall be made to repair or replace a leaking component as specified in this paragraph within 15 days after the leak is found. If the repair of a component would require a unit shutdown, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot be repaired until a scheduled shutdown shall be identified for such repair by tagging. At the discretion of the TCEQ Executive Director or designated representative, early unit shutdown or other appropriate action may be required based on the number and severity of tagged leaks awaiting shutdown.
- D. Date and time of each inspection shall be noted in the operator's log or equivalent. Records shall be maintained at the plant site of all repairs and replacements made due to leaks. These records shall be made readily available to representatives of the TCEQ or any local program with jurisdiction upon request.

Initial Determination of Compliance

5. The holder of this permit shall perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the Unit No. 8 Stack designated as EPN 101. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. (PSD) (07/07)

SPECIAL CONDITIONS

Permit Numbers 19282 and PSDTX1081

Page 3

- A. Sampling shall be conducted in accordance with Title 40 Code of Federal Regulations (40 CFR) Part 60, Appendix A, Method 7, "Determination of Nitrogen Oxide (NO_x) Emissions from Stationary Sources" and Method 8, "Determination of SO₂ and H₂SO₄ Emissions from Stationary Sources" and Method 10, "Determination of Carbon Monoxide (CO) Emissions from Stationary Sources" and other applicable testing methods.
- B. The appropriate TCEQ Regional Office in the region where the source is located and applicable local air program(s) shall be contacted as soon as testing is scheduled, but not less than 45 days prior to sampling to schedule a pretest meeting.

The notice shall include:

- (1) Date for pretest meeting.
- (2) Date sampling will occur.
- (3) Name of firm conducting sampling.
- (4) Type of sampling equipment to be used.
- (5) Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

A written proposed description of any deviation from sampling procedures specified in permit provision or the TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Director shall approve or disapprove of any deviation from specified sampling procedures.

Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Air, Air Permits Division. Test waivers and alternate/equivalent procedure proposals for New Source Performance Standard testing which must have EPA approval shall be submitted to the TCEQ Field Operations Division in Austin.

- C. Air contaminants emitted from the Unit No. 8 Stack to be tested for include chlorine, SO₂, H₂SO₄ mist, CO, NO_x, antimony, arsenic, barium, beryllium, cadmium, chromium, lead, mercury, nickel, selenium, silver and thallium. These stack testing results shall be used to demonstrate compliance with Special Condition Nos. 1 and 2.

SPECIAL CONDITIONS

Permit Numbers 19282 and PSDTX1081

Page 4

- D. Sampling shall occur at such other times as may be required by the Executive Director of the TCEQ. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office. Additional time to comply with the applicable requirements of 40 CFR Part 60 and 40 CFR Part 61 requires prior approval and requests shall be submitted to the TCEQ Field Operations Division in Austin.
- E. The sulfuric acid plant shall be sampled while operating at the maximum possible safe production rate (as determined by the permittee) for the H_2SO_4 unit at the time of testing. The H_2SO_4 production rate shall be monitored and recorded during the stack test. If the normal production rate of H_2SO_4 from this facility exceeds by more than 10 percent the tons per day maintained during sampling, the company must notify, in writing, the appropriate TCEQ Regional Office, and the source may be subject to additional sampling to demonstrate continued compliance.
- F. Sampling reports shall comply with the attached conditions of Chapter 14 of the TCEQ Sampling Procedures Manual. The final sampling report shall be forwarded to the following within sixty days after sampling is completed:

One copy to the TCEQ Houston Regional Office.

One copy to each appropriate local air pollution control program.

One copy to the EPA Region 6 New Source Review Section in Dallas.

Continuous Determination of Compliance

- 6. The holder of this permit shall install, calibrate, maintain and operate a continuous emission monitoring system (CEMS) to measure and record the in-stack concentration of SO_2 and the total gas flow rate from the Unit No. 8 Stack (EPN 101).
 - A. The CEMS calibration shall be checked daily and the CEMS shall be zeroed and spanned using cylinder gas at least once a week and corrective action taken when the results differ by greater than ± 5 percent from the tagged cylinder gas value.
 - B. The monitoring data shall be reduced to one-hour average concentrations at least once every month using a minimum of four equally-spaced data points from each one-hour period. The individual average concentrations shall be reduced to units of the permit allowable emissions rates in pounds of SO_2 per hour at least once every month.

SPECIAL CONDITIONS

Permit Numbers 19282 and PSDTX1081

Page 5

- C. All monitoring data and quality-assurance data shall be maintained by the source for a period of two years and shall be made readily available to TCEQ personnel, EPA personnel or any local program with jurisdiction upon request. The data from the CEMS may, at the discretion of the TCEQ, EPA personnel or any local program with jurisdiction, be used to determine compliance with the SO₂ emission limits specified in MAERT.
- D. The CEMS must operate at all times when sulfur bearing compounds (except natural gas) are being fed to the furnace, but need not operate during CEMS breakdown, repairs for calibration checks and zero span adjustments. (12/07)
- E. CEMS shall be used to demonstrate compliance with the SO₂ emission limits as found in Special Condition No. 2. The permit holder must meet the quality assurance procedures required by 40 CFR Part 60 Appendix F or any alternate procedures specified in the Alternate Monitoring Plan (AMP) (Attachment A). (12/07)
 - (1) The SO₂ CEMS shall monitor and record the three hour arithmetic average (not weighted by production volume) SO₂ emission rate in units of pounds per ton of one hundred percent acid produced.
 - (2) The SO₂ CEMS shall monitor and record the SO₂ emission rate averaged (arithmetic average, not weighted by production) over all operation hours in each 365 day period in units of pounds per ton of one hundred percent acid produced.
 - (3) Implementation of the monitoring requirements has been defined in the AMP for the SO₂ CEMS system.
 - (4) The AMP supersedes the corresponding SO₂ monitoring requirements of NSPS Subpart H.
 - (5) All steps necessary to avoid CEMS breakdowns and minimize CEMS down time must be taken. This shall include, but is not limited to, operating and maintaining the CEMS in accordance with best practices and maintaining an on-site inventory of spare parts or other supplies necessary to make rapid repairs of the equipment.
 - (6) In the event of a CEMS downtime lasting longer than twenty-four hours, the permittee shall demonstrate compliance with the emission limits established in Special Condition No. 2 according to the procedures specified in the AMP.

SPECIAL CONDITIONS

Permit Numbers 19282 and PSDTX1081

Page 6

7. The minimum liquid flow to the second stage of the absorber shall be 600 gallons per minute (gpm). The circulation rate shall be monitored and recorded at least once a day. (11/11)

The liquid flow rate shall be recorded at least once an hour.

The flow monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least annually, whichever is more frequent, and shall be accurate to within 2 percent of span or 5 percent of the design value.

The minimum pH of the scrubbing solution downstream of the Brinks mist filter is 5.0. This pH shall be analyzed and recorded at least once a day.

Each monitoring device shall be cleaned with an automatic cleaning system, or cleaned weekly using hydraulic, chemical or mechanical cleaning. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least weekly, whichever is more frequent, and shall be accurate to within 0.5 pH unit.

Quality-assured (or valid) data must be generated when the facility generating emissions are operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in hours) that the facility generating emissions operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgement and the methods used recorded.

8. The following requirements apply to capture systems for EPN 101. (07/07)
- A. The permit holder shall conduct a once a month visual, audible, and/or olfactory inspection of the capture system to verify there are no leaking components in the capture system;
 - B. The control device shall not have a bypass.
 - C. If any of the above inspections are not satisfactory, the permit holder shall promptly take necessary corrective action.

SPECIAL CONDITIONS

Permit Numbers 19282 and PSDTX1081

Page 7

Planned Maintenance, Startup and Shutdown

9. Catalyst converter planned MSS activity is limited to 512 hours per rolling twelve months from EPN CATSCNU8. Planned MSS generated particulate emissions shall be directed to a bag filter. Outlet bag filter grain loading shall be limited to a maximum of 0.01 grains per dry standard cubic foot. (11/11)

Only these planned MSS activities described in this condition are authorized by this permit. These emissions are subject to the maximum allowable emission rates indicated on the maintenance, start-up, and shutdown (MAERT). The performance of each planned maintenance activity and emissions associated with it shall be recorded and the rolling 12-month emissions shall be updated on a monthly basis. These records shall include at least the following information: (11/11)

- (1) The physical location at which emissions from the planned MSS activity occurred, including the emission point number, common name, and any other identifier for the point at which the emissions were released into the atmosphere;
- (2) The type of planned MSS activity and the reason for the planned activity;
- (3) The common name and the facility identification number of the facilities at which the planned MSS activity and emissions occurred;
- (4) The date and time of the planned MSS activity and its duration;
- (5) The estimated quantity of each air contaminant, or mixture of air contaminants, emitted with the data and methods used to determine it. The emissions shall be estimated using the methods identified in the amendment application, PI-1 dated July 28, 2011, consistent with good engineering practice.

Dated November 22, 2011

ATTACHMENT A

Alternative Monitoring Plan for SO₂ Emissions Rhodia Inc. Houston, Texas Unit 8 Single Absorption Sulfuric Acid Plant with Scrubber

Justification for Using an Alternative Monitoring Plan (AMP) for SO₂ emissions

Sulfur dioxide emissions from the Houston 8 sulfuric acid unit will be monitored in accordance with the requirements of the existing NSPS for sulfuric acid plants except as noted in this AMP. The CEMS will demonstrate compliance on a real-time basis with the SO₂ emissions standard (as lbs of SO₂ per ton of 100% sulfuric acid produced) using stack SO₂ and O₂ analyzers. The purpose of this AMP is to document the calculation methods that will be utilized to demonstrate compliance with regulations as modified by the Consent Decree.

Definitions

"CEMS" or "Continuous Emission Monitoring System" shall mean equipment that continuously measures and records the concentration and/or emission rate of a pollutant, in the units specified by the emission limit concerned.

"Long-Term Limit" shall mean a sulfur dioxide (SO₂) emission limit for a sulfuric acid plant expressed as pounds per ton of 100% sulfuric acid produced ("lbs/ton"), averaged over all Operating Hours in a rolling 365-day period.

"Malfunction" shall mean, consistent with 40 C.F.R. § 60.2, any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner, but shall not include failures that are caused in part by poor maintenance or careless operation.

"Operating Hours" shall mean periods during which sulfur or sulfur-bearing compounds, excluding conventional fossil fuels such as natural gas or fuel oil, are being fed to the furnace.

"Short-Term Limit" shall mean the SO₂ emission limit for each sulfuric acid plant expressed as pounds per ton of 100% sulfuric acid produced ("lbs/ton"), averaged over each rolling 3-hour period. Except for periods of Startup, Shutdown and Malfunction, the Short-Term Limits established under this Consent Decree shall apply at all times.

"Shutdown" shall mean the cessation of operation of a sulfuric acid plant for any reason. Shutdown begins at the time sulfur or sulfur-bearing feeds, excluding conventional fossil fuels such as natural gas or fuel oil, to the furnace ceases.

ATTACHMENT A

Permit Numbers 19282 and PSDTX1081

Page 2

"Startup" shall mean the 24-hour period at any sulfuric acid plant beginning when the feed of sulfur or sulfur-bearing materials, excluding conventional fossil fuels such as natural gas or fuel oil, to the furnace commences after a main gas blower shutdown.

Part 60.84 Emissions Monitoring.

Compliance with the Long-Term Limit and Short-Term Limit defined by the Consent Decree will be demonstrated using SO₂ and O₂ analyzers at the exit stack using the following equation. Refer to additional discussion below the equation for specific details related to data input and calculation.

Equation 1

$$X_e = (0.209 - MO_2 - MSO_2) / (0.209 - MO_2 + 0.186 \times MSO_2)$$

$$E = (K / X_e) - K$$

Where:

X_e = fractional conversion efficiency

MO₂ = fractional concentration of O₂ at the stack, dry basis

MSO₂ = fractional concentration of SO₂ at the stack, dry basis

E = SO₂ emission rate in lb / ton of 100 % acid produced

K = 1306 = (2000 lb / ton) x (64 lb / lbmol SO₂) / (98 lb / lbmol H₂SO₄)

Short-Term Limit

The following procedure and calculation will be performed once every five minutes during all Operating Hours, except periods of Startup, Shutdown or Malfunction, to demonstrate compliance with the Short-Term Limit for SO₂.

- At any given time the system will maintain an array consisting of the 36 most recent samples of the O₂ and SO₂ concentrations at the exit stack.
- Once every five minutes, the system will sample the latest O₂ and SO₂ concentrations, add the recent readings to the array and delete the oldest readings. If the unit is not operating then the array of data will not change.
- MO₂_{3hravg} will then be calculated as the arithmetic average of the 36 most recent data samples for the fractional concentration of O₂ at the stack (MO₂_{3hravg}).

ATTACHMENT A

Permit Numbers 19282 and PSDTX1081

Page 3

- $MSO2_{3hravg}$ will then be calculated as the arithmetic average of the 36 most recent data samples for the fractional concentration of SO_2 at the stack ($MSO2_{3hravg}$).
- The rolling 3 hour average SO_2 emissions (E_{3hravg}) will then be calculated per Equation 2.

Equation 2 (rolling 3 hour average SO_2 emissions)

$$Xe_{3hravg} = (0.209 - MO2_{3hravg} - MSO2_{3hravg}) / (0.209 - MO2_{3hravg} + 0.186 \times MSO2_{3hravg})$$
$$E_{3hravg} = (K / Xe_{3hravg}) - K$$

- The production unit will be deemed to be operating in compliance with the Short Term Limit if $E_{3hr-avg}$ does not exceed 3.0 lb of SO_2 per ton of 100% sulfuric acid produced during all Operating Hours except periods of Startup, Shutdown or Malfunction.

During routine calibration checks and adjustments of the O_2 or SO_2 monitors, the O_2 or SO_2 measurement will be "frozen" at its pre-calibration level. Refer to System Maintenance and Malfunction for guidance during CEMS malfunctions, breakdowns, and repairs.

Long-Term Limit

The following method will be used to calculate the daily average lb of SO_2 per ton of 100% sulfuric acid, and the number of Operating Hours for the calendar day.

- Once every five minutes during all Operating Hours, the O_2 and SO_2 concentrations at the exit stack will be sampled and this time will be counted as five operating minutes. If the unit is not operating, then the O_2 and SO_2 concentrations will not be sampled.
- The daily average will be calculated as follows for each calendar day:
 - o $MO2_{daily avg}$ will be calculated as the arithmetic average of the sample population for the fractional concentration of O_2 at the stack.
 - o $MSO2_{daily avg}$ will be calculated as the arithmetic average of the sample population for the fractional concentration of SO_2 at the stack.
 - o $E_{(daily avg)}$ will then be calculated using Equation 3.

Equation 3 (daily average SO_2 emissions)

$$Xe_{daily avg} = (0.209 - MO2_{daily avg} - MSO2_{daily avg}) / (0.209 - MO2_{daily avg} + 0.186 \times MSO2_{daily avg})$$

$$E_{daily avg} = (K / Xe_{daily avg}) - K$$

ATTACHMENT A

Permit Numbers 19282 and PSDTX1081

Page 4

- The number of operating minutes for the day will be summed (T_{day})
- E_{dayavg} and T_{day} will be used to calculate a 365-day rolling average of lb/ton. The daily averages will be weighted by the number of operating minutes per day, as per Equation 4.

Once the system has been in operation for 365 days, compliance with the Long Term Limit (365-day rolling average) SO_2 emission rate will be calculated using Equation 4.

Equation 4

$$E_{365avg} = \frac{\sum [E_{dayavg} * T_{day}]}{\sum T_{day}}$$

The production unit will be deemed to be operating in compliance with the Long-Term Limit if E_{365avg} does not exceed 1.7 lb of SO_2 per ton of 100% sulfuric acid produced during all Operating Hours

During routine calibration checks and adjustments of the O_2 or SO_2 monitors, the O_2 or SO_2 measurement will be “frozen” at its pre-calibration level. Refer to System Maintenance and Malfunction for guidance during CEMS malfunction, breakdowns, and repairs:

Pt. 60.84 Emissions Monitoring Pt. 60, App. B, Spec. 2, Section 6.0 (Stack Analyzers)

Rhodia proposes to use the following stack analyzer specifications to satisfy the requirements of Pt. 60.84 and Pt. 60, App. B, Spec. 2, Section 6.0. The stack analyzer span must be capable of accommodating elevated emissions during startup.

An equivalent analyzer may be substituted for any reason.

Location	Manufacturer	Model Number	Range
Stack SO_2	Ametek Photometric Analyzer (or equivalent)	920 (or equivalent)	Dual range: Normal: 0 – 500 ppm SO_2 SSM: 0 – 3,600 ppm SO_2
Stack O_2	Ametek Oxygen Analyzer (or equivalent)	920 (or equivalent)	Single range: 0 – 20.9 % O_2

ATTACHMENT A

Permit Numbers 19282 and PSDTX1081

Page 5

Pt. 60, App. B, Spec. 2, Section 1.0 (Stack Analyzers)

Initial compliance certification required only if the analyzer is replaced or if system modifications require one to be performed. Additional detail and exceptions noted below under System Modifications below.

System Maintenance and Malfunction

Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the plant shall conduct monitoring in continuous operation during all Operating Hours as defined above

In the event of a CEMS malfunction of greater than 24 hours:

- SO₂ in the exit stack gas will be sampled and analyzed at least once per hour, during all Operating Hours. Sampling will be conducted by Reich test or other method (e.g. portable analyzer).
- O₂ in the exit stack gas will be sampled and analyzed at least once per hour, during all Operating Hours. Sampling will be conducted by Orsat test or other method (e.g. portable analyzer)
- Compliance with the Short-Term Limit and Long-Term Limit shall be verified by using these data and Equations 2, 3, and 4 with the following exception. Given that one or both of the stack CEMS is out of service, the most recent hourly reading(s) will be substituted for the 12 (24) five-minute readings that would otherwise be taken if the system was operating normally

In the event of an analyzer malfunction, a like-kind replacement may be used while repairs are being made. A cylinder gas audit (CGA) must be performed on the replacement analyzer as soon as is practicable after it is placed in service. The daily calibration drift requirement would also apply to the replacement analyzer.

System Modifications

Significant replacement, modification, or change in certified CEMS equipment may require a complete recertification. If a recertification is required, it will be conducted within 90 days. Examples include:

- Change in location or orientation of the sampling probe or site
- Complete replacement of an existing continuous emission monitoring system.

ATTACHMENT A

Permit Numbers 19282 and PSDTX1081

Page 6

When replacing components that can alter the physical characteristics or conditioning of the sample in the field, a CGA is required. The following activities will require a CGA to be performed before returning the analyzer to service.

- Replacement of the analyzer
- Detector replacement
- Replacement of equipment associated with the detector

The following activities are not expected to trigger a CGA. However, it is recommended that a Calibration Drift check be performed before returning to service.

- Filter replacement
- Data Recorder Repairs
- Tubing replacement

General guidance: When replacing components or devices that do not affect the physical characteristics or handling of the gas in the field such as data recorders, a CGA is not required. A calibration drift check normally should be conducted. If the repaired component affects the transport of the gas to the analyzer, such as replacing tubing, a leak check should be conducted.

Dated November 22, 2011



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Permit Number 19282/PSDTX1081

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
101	Unit No. 8 Stack	CO	1.75	7.65
		H ₂ SO ₄ (7)	16.25	71.18
		NO _x	9.75	42.70
		PM	3.36	14.72
		PM ₁₀	3.36	14.72
		PM _{2.5}	3.36	14.72
		SO ₂	325.03	806.65
		Ag	0.022	0.095
		As	0.068	0.297
		Ba	0.023	0.099
		Be	0.014	0.063
		Cd	0.014	0.063
		Cl ₂	0.721	3.159
		Cr	0.077	0.337
		Hg	0.0004	0.002
		Ni	0.061	0.267
		Pb	0.032	0.141
		Sb	0.037	0.158
		Se	0.044	0.192
		Tl	0.014	0.063
102	Acid Pump Tank	SO ₂	0.01	0.01
103	Natural Gas Start Up Vent (9)	CO	4.12	
		NO _x	4.90	
		PM	0.37	
		PM ₁₀	0.37	
		PM _{2.5}	0.37	
		SO ₂	0.03	
		VOC	0.27	
105	Natural Gas Start Up Vent (9)	CO	4.12	
		NO _x	4.90	
		PM	0.37	
		PM ₁₀	0.37	
		PM _{2.5}	0.37	
		SO ₂	0.03	
		VOC	0.27	

Emission Sources – Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
106	Natural Gas Start Up Vent (9)	CO	4.12	
		NO _x	4.90	
		PM	0.37	
		PM ₁₀	0.37	
		PM _{2.5}	0.37	
		SO ₂	0.03	
		VOC	0.27	
	Annual Emission Cap (6) (EPNs 103, 105 and 106)	CO		0.31
		NO _x		0.37
		PM		0.03
		PM ₁₀		0.03
		PM _{2.5}		0.03
		SO ₂		0.01
		VOC		0.02
CATSCNU8	Catalyst Screening (8)	PM	0.01	0.01
		PM ₁₀	0.01	0.01
		PM _{2.5}	0.01	0.01
FE1	Process Fugitives (5)	SO ₂	0.01	0.03

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.

(2) Specific point source name. For fugitive sources, use area name or fugitive source name.

(3) Ag - silver

As - arsenic

Ba - barium

Be - beryllium

Cd - cadmium

Cl₂ - chlorine

CO - carbon monoxide

Cr - chromium

Hg - mercury

H₂SO₄ - sulfuric acid mist

Ni - nickel

NO_x - total oxides of nitrogen

Pb - lead

PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented

PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented

PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter

Sb - antimony

Se - selenium

SO₂ - sulfur dioxide

Emission Sources – Maximum Allowable Emission Rates

TI - thallium

VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1

- (4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
- (6) 150 hours of operation on a rolling 12-month basis for EPNs 103, 105 and 106.
- (7) PSDTX1081 pollutant.
- (8) Planned maintenance, startup and shutdown activity only
- (9) Planned startup activity only

Emission rates are based on and the facilities are limited by the following maximum operating schedule:

Hrs/day 24 Days/week 7 Weeks/year 52

Date: November 22, 2011



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— 242 —

Journal of Management Education 30(6)p.789-804
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1. *Pharmaceutical industry*

AIR, PESTICIDES, AND TOXICS 6TH FLOOR RECORDS CENTER INFILING / NEW FILE FORM

439090

New File ☐

OR

Infiling ☒

Choose from the file types below:

AIR FACILITY:

- ☐ AR - Acid Rain
- ☐ CB - Confidential Business
- ☐ CO - Compliance
- ☐ EN - **Enforcement
- ☐ GE - General
- ☒ PE - Permit
- ☐ RA - Regulatory Applicability
- ☐ Other _____

TSCA:

- ☐ AH - Asbestos Hazard Emergency Response Act
- ☐ AS or AW - Asbestos or Asbestos Worker Protection
- ☐ CB - Confidential
- ☐ FI - Site Specific
- ☐ FO - Non Site Specific
- ☐ IM - **Section 5 & 8
- ☐ LB - **Lead
- ☐ PC - **PCB

** Extension of file type (if needed): ☐ ES - Enforcement Sensitive
☐ DO - Docket Number

EPCRA/SARA ☐**FIFRA** ☐

EPA Registry I.D.

Current FRS Number:
(Found in EnviroFacts)

110000460901

Facility Name & Physical Address:

Rhodia Inc.

8615 Manchester St.

Houston, TX. 77012 2142

Remarks:

Requestor's Name & Phone Number:

Les Koval

X6733

Program Management Files:

A current listing of these file types and their numeric codes are located in a blue binder on the top shelf of the "APT" file cabinet in the 9th Floor Records Center.

AIRS - Aerometric Information Retrieval System

ATO - Air Toxics

EMR - Emergency Response

ENF - Enforcement -

ENF 5-5-1 requires Month and Fiscal Year accompany file code.

ENF 5-6-5 requires Fiscal Year accompany file code.

EXR - External Relations

GEO - Geographical Summary Data

GRA - Grants Administration

The majority of this section requires the Fiscal Year accompany file code.

Project Officer Grants require the Grant number and Fiscal Year accompany file code.

LAB - Laboratory Support

LBP - Lead Based Paint

LBP 12-3 requires the facility name in which document refers to be either highlighted or circled on the top page.

LEL - Legal and Legislative

MON - Monitoring NES - National Emission Standards

NSP - New Source Performance

NSR - New Source Review

OPP - Operating Permits Program

PEA - Permits Administration Program

PES - Pesticides

PLA - Planning

PUA - Public Affairs

RAD - Radiation

RCR - Resource Conservation and Recovery Act - Regulatory Development

RDE - Research and Development

REG - Registration

SIP - State Implementation Plan

SUP - Superfund

TITL - Title III

TSC - Toxic Substance Control

TSC 1-1-4 requires the facility name in which document refers to be either highlighted or circled on the top page.

TSU - Technical Support

VRP - Voluntary Reduction Program



EPA

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 14, 2012

MR WILLIAM MCCONNELL
PLANT MANAGER
RHODIA INC
8615 MANCHESTER ST
HOUSTON TX 77012-2142

Re: Permit Amendment Application
Permit Number: 19282
Rhodia Houston Plant
Houston, Harris County
Regulated Entity Number: RN100220581
Customer Reference Number: CN600125330
Account Number: HG-0697-0
Associated Permit Number: PSDTX1081

RECEIVED
12 SEP 25 PM 4:18
AIR PERMITS SECTION
6PD-R

Dear Mr. McConnell:

This is in response to your letter received March 26, 2012 and your Form PI-1 (General Application for Air Preconstruction Permits and Amendments) concerning the proposed amendment to Permit Number 19282. We understand that you propose to replace the drying and oleum towers in the No. 8 production unit.

As indicated in Title 30 Texas Administrative Code § 116.116(b) [30 TAC § 116.116(b)], and based on our review, Permit Number 19282 is hereby amended. This information will be incorporated into the existing permit file. Enclosed is the revised maximum allowable emission rates (MAERT) table to replace those currently attached to your permit. There are no changes to the current special conditions of the permit.

Planned maintenance, startup, and shutdown emissions have been previously reviewed, authorized, and included in the MAERT. Any other maintenance activities are not authorized by this permit and will need to obtain a separate authorization.

This amendment will be automatically void upon the occurrence of any of the following, as indicated in 30 TAC § 116.120(a):

1. Failure to begin construction of the changes authorized by this amendment within 18 months from the date of this authorization.
2. Discontinuance of construction of the changes authorized by this amendment for a period of 18 consecutive months or more.
3. Failure to complete the changes authorized by this amendment within a reasonable time.

Mr. William McConnell

Page 2

September 14, 2012

Re: Permit Number: 19282

Upon request, the executive director may grant extensions as allowed in 30 TAC § 116.120(b).

You may file a **motion to overturn** with the Chief Clerk. A motion to overturn is a request for the commission to review the executive director's decision. Any motion must explain why the commission should review the executive director's decision. According to 30 TAC § 50.139, an action by the executive director is not affected by a motion to overturn filed under this section unless expressly ordered by the commission.

A motion to overturn must be received by the Chief Clerk within 23 days after the date of this letter. An original and 11 copies of a motion must be filed with the Chief Clerk in person, or by mail to the Chief Clerk's address on the attached mailing list. On the same day the motion is transmitted to the Chief Clerk, please provide copies to the applicant, the executive director's attorney, and the Public Interest Counsel at the addresses listed on the attached mailing list. If a motion to overturn is not acted on by the commission within 45 days after the date of this letter, then the motion shall be deemed overruled.

You may also request **judicial review** of the executive director's approval. According to Texas Health and Safety Code § 382.032, a person affected by the executive director's approval must file a petition appealing the executive director's approval in Travis County district court within 30 days after the **effective date of the approval**. Even if you request judicial review, you still must exhaust your administrative remedies, which includes filing a motion to overturn in accordance with the previous paragraphs.

Your cooperation in this matter is appreciated. If you need further information or have any questions, please contact Mr. Kyle Virr at (512) 239-1464 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Mr. William McConnell

Page 3

September 14, 2012

Re: Permit Number: 19282

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael Wilson".

Michael Wilson, P.E., Director
Air Permits Division
Office of Air
Texas Commission on Environmental Quality

MPW/kv

Enclosures

cc: Bureau Chief Pollution Control & Prevention, Environmental Health Division, Houston
Department of Health and Human Services, Houston
Director, Harris County, Pollution Control Services, Pasadena
Air Section Manager, Region 12 - Houston
Air Permits Section Chief, New Source Review, Section (6PD-R), U.S. Environmental
Protection Agency, Region 6, Dallas

Project Number: 175781



1. The first part of the document is a letter from the
author to the editor, dated 1964. The letter is
written in a very informal style and contains
many references to the author's personal life.
The author is a young man who is currently
studying at the University of California, Berkeley.
He is a member of the Phi Kappa Phi Honor Society
and is a member of the Beta Beta Beta Biological
Honors Society. He is also a member of the
Sigma Xi Scientific Honors Society. The letter
is signed "John Doe" and is dated "1964".

Emission Sources - Maximum Allowable Emission Rates

Permit Number 19282

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
101	Unit No. 8 Stack	CO	1.75	7.65
		H ₂ SO ₄ (7)	13.00	56.94
		NO _x	9.75	42.7
		PM	3.36	14.72
		PM ₁₀	3.36	14.72
		PM _{2.5}	3.36	14.72
		SO ₂	325.00	724.20
		Ag	0.022	0.095
		As	0.068	0.297
		Ba	0.023	0.099
		Be	0.014	0.063
		Cd	0.014	0.063
		Cl ₂	0.721	3.159
		Cr	0.077	0.337
		Hg	0.0004	0.002
		Ni	0.061	0.267
		Pb	0.032	0.141
		Sb	0.037	0.158
		Se	0.044	0.192
		Tl	0.014	0.063

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
102	Acid Pump Tank	SO ₂	0.01	0.01
103	Natural Gas Start Up Vent (9)	CO	4.12	
		NO _x	4.90	
		PM	0.37	
		PM ₁₀	0.37	
		PM _{2.5}	0.37	
		SO ₂	0.03	
		VOC	0.27	
105	Natural Gas Start Up Vent (9)	CO	4.12	
		NO _x	4.90	
		PM	0.37	
		PM ₁₀	0.37	
		PM _{2.5}	0.37	
		SO ₂	0.03	
		VOC	0.27	
106	Natural Gas Start Up Vent (9)	CO	4.12	
		NO _x	4.90	
		PM	0.37	
		PM ₁₀	0.37	
		PM _{2.5}	0.37	
		SO ₂	0.03	
		VOC	0.27	
	Annual Emission	CO		0.31

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
	Cap (6) (EPNs 103, 105 and 106)	NO _x		0.37
		PM		0.03
		PM ₁₀		0.03
		PM _{2.5}		0.03
		SO ₂		0.01
		VOC		0.02
CATSCNU8	Catalyst Screening (8)	PM	0.01	0.01
		PM ₁₀	0.01	0.01
		PM _{2.5}	0.01	0.01
FE1	Process Fugitives (5)	SO ₂	0.01	0.03

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) Exempt Solvent - Those carbon compounds or mixtures of carbon compounds used as solvents which have been excluded from the definition of volatile organic compound.
- VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
- HRVOC - highly reactive volatile organic compounds as defined in 30 TAC § 115.10
- IOC-U - inorganic compounds (unspeciated)
- NO_x - total oxides of nitrogen
- SO₂ - sulfur dioxide
- PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
- PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
- PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter
- CO - carbon monoxide
- HAP - hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of Federal Regulations Part 63, Subpart C
- (4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

Date: September 14, 2012

1. The first step is to identify the problem or question that needs to be answered. This involves understanding the context and the specific requirements of the task.

AIR, PESTICIDES, AND TOXICS 6TH FLOOR RECORDS CENTER INFILING / NEW FILE FORM

New File ☐

OR

Infiling ☒

Choose from the file types below:

AIR FACILITY:

- (☐) AR - Acid Rain
- (☐) CB - Confidential Business
- (☐) CO - Compliance
- (☐) EN - **Enforcement
- (☐) GE - General
- (☒) PE - Permit
- (☐) RA - Regulatory Applicability
- (☐) Other _____

TSCA:

- (☐) AH - Asbestos Hazard Emergency Response Act
- (☐) AS or AW - Asbestos or Asbestos Worker Protection
- (☐) CB - Confidential
- (☐) FI - Site Specific
- (☐) FO - Non Site Specific
- (☐) IM - **Section 5 & 8
- (☐) LB - **Lead
- (☐) PC - **PCB

** Extension of file type (if needed): (☐) ES - Enforcement Sensitive
(☐) DO - Docket Number

EPCRA / SARA (☐)**FIFRA** (☐)

EPA Registry I.D.

Current FRS Number:
(Found in EnviroFacts)

110000460901

Facility Name & Physical Address:

Rhodia Inc.
Regeneration Unit No. 2

8615 Manchester St,

Houston, TX, 77012 2142

Remarks:

aka; Rhodia Houston Plant

Requestor's Name & Phone Number:

Les Kovg

X6733

Program Management Files:

A current listing of these file types and their numeric codes are located in a blue binder on the top shelf of the "APT" file cabinet in the 9th Floor Records Center.

AIRS - Aerometric Information Retrieval System

ATO - Air Toxics

EMR - Emergency Response

ENF - Enforcement -

ENF 5-5-1 requires Month and Fiscal Year accompany file code.

ENF 5-6-5 requires Fiscal Year accompany file code.

EXR - External Relations

GEO - Geographical Summary Data

GRA - Grants Administration

The majority of this section requires the Fiscal Year accompany file code.

Project Officer Grants require the Grant number and Fiscal Year accompany file code.

LAB - Laboratory Support

LBP - Lead Based Paint

LBP 12-3 requires the facility name in which document refers to be either highlighted or circled on the top page.

LEL - Legal and Legislative

MON - Monitoring NES - National Emission Standards

NSP - New Source Performance

NSR - New Source Review

OPP - Operating Permits Program

PEA - Permits Administration Program

PES - Pesticides

PLA - Planning

PUA - Public Affairs

RAD - Radiation

RCR - Resource Conservation and Recovery Act - Regulatory Development

RDE - Research and Development

REG - Registration

SIP - State Implementation Plan

SUP - Superfund

TITL - Title III

TSC - Toxic Substance Control

TSC 1-1-4 requires the facility name in which document refers to be either highlighted or circled on the top page.

TSU - Technical Support

VRP - Voluntary Reduction Program

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



EPA

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 10, 2012

MR FLOYD DICKERSON
ENVIRONMENTAL MANAGER
RHODIA INC
8615 MANCHESTER ST
HOUSTON TX 77012-2142

RECEIVED
12 FEB 27 PM 12:08
AIR PERMITS SECTION
6PD-R

Re: Permit Amendment Application
Permit Numbers: 4802 and PSDTX1260
Regeneration Unit No 2
Houston, Harris County
Regulated Entity Number: RN100220581
Customer Reference Number: CN600125330
Account Number: HG-0697-O

Dear Mr. Dickerson:

This is in response to your letter received June 6, 2011 and your Form PI-1 (General Application for Air Preconstruction Permits and Amendments) concerning the proposed amendment to Permit Number 4802 and issuance of Permit PSDTX1260. We understand you propose to increase daily sulfuric acid production, install a caustic scrubber to reduce existing sulfur dioxide emissions and authorize increased sulfuric acid mist emissions.

As indicated in Title 30 Texas Administrative Code § 116.116(b) [30 TAC § 116.116(b)], and based on our review, Permit Number 4802 is hereby amended and Permit Number PSDTX1260 is issued. This information will be incorporated into the existing permit file. Enclosed are revised special conditions pages and a maximum allowable emission rates (MAERT) table to replace those currently attached to your permit. We appreciate your careful review of the special conditions of the permit and assuring that all requirements are consistently met.

Planned maintenance, startup, and shutdown for the sources identified on the MAERT have been reviewed and included in the MAERT and specific maintenance activities are identified in the permit special conditions. Any other maintenance activities are not authorized by this permit and will need to obtain separate authorization.

Mr. Floyd Dickerson

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February 10, 2012

Re: Permit Numbers: 4802 and PSDTX1260

This amendment will be automatically void upon the occurrence of any of the following, as indicated in 30 TAC § 116.120(a):

1. Failure to begin construction of the changes authorized by this amendment within 18 months from the date of this authorization.
2. Discontinuance of construction of the changes authorized by this amendment for a period of 18 consecutive months or more.
3. Failure to complete the changes authorized by this amendment within a reasonable time.

Upon request, the executive director may grant extensions as allowed in 30 TAC § 116.120(b).

As of July 1, 2008, all analytical data generated by a mobile or stationary laboratory in support of compliance with air permits must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory under the Texas Laboratory Accreditation Program or meet one of several exemptions. Specific information concerning which laboratories must be accredited and which are exempt may be found in 30 TAC § 25.4 and § 25.6.

For additional information regarding the laboratory accreditation program and a list of accredited laboratories and their fields of accreditation, please see the following Web site:

www.tceq.texas.gov/compliance/compliance_support/qa/env_lab_accreditation.html

For questions regarding the accreditation program, you may contact the Texas Laboratory Accreditation Program at (512) 239-3754 or by e-mail at labprgms@tceq.texas.gov.

You may file a **motion to overturn** with the Chief Clerk. A motion to overturn is a request for the commission to review the executive director's decision. Any motion must explain why the commission should review the executive director's decision. According to 30 TAC § 50.139, an action by the executive director is not affected by a motion to overturn filed under this section unless expressly ordered by the commission.

A motion to overturn must be received by the Chief Clerk within 23 days after the date of this letter. An original and 11 copies of a motion must be filed with the Chief Clerk in person, or by mail to the Chief Clerk's address on the attached mailing list. On the same day the motion is transmitted to the Chief Clerk, please provide copies to the applicant, the executive director's attorney, and the Public Interest Counsel at the addresses listed on the attached mailing list. If a motion to overturn is not acted on by the commission within 45 days after the date of this letter, then the motion shall be deemed overruled.

Mr. Floyd Dickerson
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February 10, 2012

Re: Permit Numbers: 4802 and PSDTX1260

You may also request **judicial review** of the executive director's approval. According to Texas Health and Safety Code § 382.032, a person affected by the executive director's approval must file a petition appealing the executive director's approval in Travis County district court within 30 days after the effective date of the approval. Even if you request judicial review, you still must exhaust your administrative remedies, which includes filing a motion to overturn in accordance with the previous paragraphs.

Your cooperation in this matter is appreciated. If you need further information or have any questions, please contact Mr. Stephen E. Anderson, P.E. at (512) 239-1287 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,



Michael Wilson, P.E., Director
Air Permits Division
Office of Air
Texas Commission on Environmental Quality

MPW/SEA

Enclosures

cc: Air Section Manager, Region 12 - Houston
Director, Environmental Public Health Division, Harris County Public Health and
Environmental Services, Pasadena
Bureau Chief Pollution Control & Prevention, Environmental Health Division, Houston
Department of Health and Human Services, Houston
Air Permits Section Chief, New Source Review, Section (6PD-R), U.S. Environmental
Protection Agency, Region 6, Dallas

Project Numbers: 166270 and 166724

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SPECIAL CONDITIONS

Permit Number 4802/PSDTX1260

Emission Standards

1. This permit authorizes emissions only from those points listed in the attached table entitled "Emission Sources- Maximum Allowable Emission Rates," and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating conditions specified in this permit.
2. Complaints from affected persons of nuisance odors from the site verified by the Texas Commission on Environmental Quality (TCEQ) or any air pollution control agency with appropriate jurisdiction shall be the basis for requiring prompt remedial action to eliminate such odors. The TCEQ may require these facilities to implement one or more of the following measures: temporary production curtailment; temporary shutdown during adverse meteorological conditions; install any additional controls that are necessary to control odor emissions, etc., according to a schedule determined by TCEQ. (08/10)
3. The sulfur dioxide (SO₂) emissions from Regeneration Unit No. 2 shall not exceed 15 tons measured over any continuous 24-hour period prior to April 1, 2014. The holder of this permit shall maintain equipment as described in its permit application which will automatically cause the operation of Regeneration Unit No. 2 to cease if the SO₂ emissions exceed for a 30-minute period at a rate which would cause more than 15 tons of SO₂ to be emitted over a 24-hour period prior to April 1, 2014. (02/12)

SO₂ emission limits will be limited to the following emission rates: (02/12)

Short term: 3.0 pounds of SO₂ per ton of one hundred percent acid produced.

Long term: 1.8 pounds of SO₂ per ton of one hundred percent acid produced.

Long term SO₂ emission limits will become effective 365 days from April 1, 2014.

H₂SO₄ mist is limited to 0.15 pound per ton of produced H₂SO₄ on an hourly maximum basis and 0.10 pound per ton of produced H₂SO₄ on an annual average basis prior to April 1, 2014 from EPN 104. EPN 104 shall be permanently shut down prior to April 1, 2014. H₂SO₄ mist is limited to 0.15 pound per ton of produced H₂SO₄ on an hourly maximum basis and 0.10 pounds per ton of produced H₂SO₄ on an annual average basis on and after April 1, 2014 from EPN 104 upon installation completion of the proposed emission abatement equipment. New EPN 104 shall be operable on and after April 1, 2014. (02/12) (PSD)

SPECIAL CONDITIONS

Permit Number 4802/PSDTX1260

Page 2

Failure to install this emission abatement equipment by April 1, 2014 shall require operation of these permitted facilities to cease and these permitted facilities shall not operate until this abatement equipment is installed and operating properly. (02/12) (PSD)

H₂SO₄ production is limited 969 tons per day prior to completion of installation and operation of the represented emission abatement equipment pursuant to this special condition. The increase in H₂SO₄ production to 1,150 tons per day shall not be effective until all represented emission abatement equipment required by this special condition is completely installed and operating properly. (02/12) (PSD)

The holder of this permit shall keep records of the daily production of H₂SO₄ and the one-hour SO₂ emissions rates for each day before and after completion of installation of the emission abatement equipment required by this special condition. Records shall be made readily available to TCEQ personnel upon request, the U.S. Environmental Protection Agency (EPA) personnel or any applicable local program with jurisdiction and may be used to determine compliance with the SO₂ emissions limitations specified in the maximum allowable emissions rates table (MAERT). (02/12) (PSD)

4. Opacity of emissions from the Unit No. 2 Stack shall not exceed 20 percent averaged over a five-minute period up to April 1, 2014.

Federal Program Requirements

5. These facilities shall comply with all applicable requirements of EPA regulations on Standards of Performance for New Stationary Sources promulgated for the following: (02/12)
 - A. Emission Guidelines and Compliance Times for Sulfuric Acid Production Units in 40 CFR Part 60, Subparts A and Cd.
 - B. Standards of Performance for Sulfuric Acid Plants in 40 CFR Part 60, Subparts A and H.
 - C. Volatile Organic Liquid Storage Vessels in 40 CFR Part 60, Subparts A and Kb only apply to Storage Tanks 48, 49, 53, B1 and B2.

These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on National Emission Standards for Hazardous Air Pollutants promulgated for Benzene Waste Operations in Title 40 Code of Federal

SPECIAL CONDITIONS

Permit Number 4802/PSDTX1260

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Regulations (40 CFR) Part 61, Subparts A and FF.

These facilities shall comply with all applicable requirements of Title 30 Texas Administrative Code (30 TAC) § 113.120 (including the referenced requirements contained in 40 CFR Part 63, Subpart G, § 113.550 (including the referenced requirements contained in 40 CFR Part 63 Subpart XX) and 113.640 (including the referenced requirements contained in 40 CFR Part 63, Subpart GGG). (12/08)

Operational Requirements

6. The No. 2 regeneration heater is limited to 1,000 hours per rolling 12-months of operation. Fuel for this heater is limited to pipeline-quality, sweet natural gas as defined in 30 TAC Chapter 101. Records shall be updated quarterly to demonstrate compliance with this special condition.
7. The use of compounds at the Regeneration Unit No. 2 (EPN 104) is limited to those identified in the attached Approved Chemical List. Modifications or construction of new facilities at this site that result in emission increases of one or more chemicals in the Approved Chemical List dated February 2012, or from chemicals currently in use and previously authorized through this special condition can only be approved through use of this special condition. Any construction of new equipment that occurs through the use of adding a new chemical is not allowed through this special condition. New chemical(s) may also be added through use of a permit by rule claim and/or registration under 30 TAC Chapter 106 or use of the qualified facilities requirements in 30 TAC Chapter 116. (02/12)
 - A. Short-term (pounds per hour [lb/hr]) and annual (tons per year) emissions and calculations shall be completed for each chemical at each affected source; emission rates shall be calculated in accordance with the methods documented in the permit amendment application (PI-1 dated September 4, 2003). The calculated emission rates shall not exceed the maximum allowable emission rate at any emission point.
 - B. The Effect Screening Level (ESL) for the chemical shall be obtained from the current Texas Commission on Environmental Quality (TCEQ) ESL list or by written request to the TCEQ Toxicology Division.
 - C. The total emissions of any compound from all emission points in this permit must satisfy one of the following conditions:

SPECIAL CONDITIONS

Permit Number 4802/PSDTX1260

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- (1) The total maximum emission rate from all sources is less than 0.04 lb/hr and the ESL greater than 2 ug/m^3 ; or
- (2) Case specific criteria based on modeling performed on July 30, 2004.

$$(ER/ESL)_N \leq (ER/ESL)_E$$

$(ER/ESL)_N$ = plant-wide maximum hourly emission rate based on maximum vapor pressure of new compound(s) divided by its ESL.

$(ER/ESL)_E$ = the highest ratio of any previously authorized compounds plant-wide hourly emission rate based on maximum vapor pressure divided by its ESL (i.e., 0.261).

D. The permit holder shall maintain records of the information below and the demonstrations in steps A through C above. The following documentation is required for each compound:

- (1) Chemical name(s), composition, and chemical abstract registry number if available.
- (2) Molecular weight.
- (3) Storage tanks, loading areas, and loading fugitive areas where the material is to be handled and the emission control device to be utilized.
- (4) Date new compound handling commenced.
- (5) Material Safety Data Sheet.
- (6) A copy of the referenced July 2004, modeling report shall be kept on-site and made available to TCEQ personnel and any local air pollution program with jurisdiction.

Planned Maintenance, Startup and Shutdown (MSS)

8. A. This permit authorizes emissions from spent sulfuric acid (H_2SO_4) Storage Tanks 48, 49, 53 and 56 and from four spent H_2SO_4 storage tank truck depressurizations in any one hour and 12,786 spent H_2SO_4 storage tank truck depressurizations in any rolling 12 months when the Regeneration Unit No. 2 Furnace, EPN 104, is shut down for the following planned maintenance, start-up, and shutdown (maintenance, start-up and shutdown) activities: **(08/10)**

SPECIAL CONDITIONS

Permit Number 4802/PSDTX1260

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Planned unit shut down for process equipment gas leak repairs, planned maintenance turnarounds and general plant preventative planned maintenance shutdowns up to a maximum of 1,314 hours per rolling 12 months.

During these planned downtime events, the emissions from the listed fixed-roof storage tanks and spent tank truck depressurizing activities shall be routed to the existing caustic scrubber and then directed to the inlet of Vapor Combustor, EPN 170, up to 1,314 hours per rolling 12-months.

A maximum of eight railcars can be depressurized at any one time, and the depressurizing vent stream(s) shall be vented to the No. 2 Regeneration Furnace designated as EPN 104 and can be directed to the caustic scrubber and then vented from the caustic scrubber to the Vapor Combustor identified as EPN 170 when the No. 2 Regeneration Furnace is down. The number of railcars depressurized in a rolling 12-month period is limited to 910 and shall be vented to the No. 2 Regeneration Furnaces designated as EPN 104 and can be directed to the caustic scrubber and then vented from the caustic scrubber to a Vapor Combustor identified as EPN 170 when the No. 2 Regeneration Furnace is down up to 1,314 hours per calendar year. (02/12)

The Vapor Combustor, EPN 120, shall receive waste gas streams when the Regeneration Unit No. 2 Furnace is not operating up to 1,314 hours per rolling 12-month period. A maximum of two hazardous waste tank trucks can be depressurized in any one hour and 550 truck depressurizations in any rolling 12-month period and vented to the No. 2 Regeneration Furnaces designated as EPN 104 and can be directed to the Vapor Combustor designated as EPN 120 when EPN 104 is down up to 1,314 hours per calendar year.

A maximum of two hazardous waste railcars can be depressurized in any one hour and 65 railcar depressurizations in any rolling 12-month period and vented to the No. 2 Regeneration Furnaces designated as EPN 104 and can be directed to the Vapor Combustor designated as EPN 120 when EPN 104 is down up to 1,314 hours per calendar year.

Emissions from planned unit shutdown for process gas leak repairs at EPN 104 planned maintenance turnarounds at EPN 104 and general plant preventative planned maintenance shutdowns at EPN 104 will be directed to EPN 120 up to a maximum of 1,314 hours per rolling 12-months.

SPECIAL CONDITIONS

Permit Number 4802/PSDTX1260

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- B. This permit authorizes emissions from EPNs 170, TKINSPMSS1, and TKINSPMSS2 for the following planned MSS activities at Storage Tanks 48, 49, 53, 56, and 78. (08/10)

A maximum of three inspections can be conducted for the group of spent acid Storage Tanks designated as 48, 49, 53, and 56 each calendar year and a maximum of two inspections can be conducted for spent acid Storage Tank 78 each calendar year. Any liquid or solid residual from each storage tank will be removed prior to or after each tank is degassed. The represented tank degassing is limited to 1,032 hours per rolling 12 months.

Any gas or vapor removed from process equipment or storage vessels must be routed to the Regeneration Unit No. 2 caustic scrubber for removal of sulfur dioxide at 99.9 percent immediately followed by the vapor combustor designated as EPN 170 for control of volatile organic compounds (VOC) at 98.0 percent (option one) or alternatively to a portable caustic scrubber for removal of SO_2 at 99.0 percent immediately followed by a portable vapor combustor for VOC destruction at 98.0 percent (option two). The portable caustic scrubber pH shall be kept at a minimum of 9.0 and shall be monitored once a day. A sufficient inventory of fresh caustic shall be kept on site during the use of the portable caustic scrubber when each storage tank undergoes a planned MSS activity.

Option one controls shall not be used to degas Storage Tank 78. Options one and two operating time is each limited to 360 hours per rolling 12 months for Storage Tanks 48, 49, 53, and 56. Option two operating time is limited to 672 hours per rolling 12 months for Storage Tank 78.

Option one or option two control must be maintained until the VOC concentration is less than 34,000 parts per million volume (ppmv) as methane in the storage tank undergoing planned MSS. Each represented storage tank shall be degassed using good engineering practice to ensure air contaminants are removed from the system through the designated option one and/or option two represented emission controls to the extent allowed by process equipment or storage vessel design. The locations and/or identifiers where the purge or liquid flush material enters the storage vessel and the exit points for the exhaust gases shall be recorded.

- C. This permit authorizes emissions from EPNs (MSS-HAZTK1 and MSS-HAZTK2) for the following planned MSS activities at Hazardous Waste Tanks (B1, B2, F2, F3, H1 and H2) and bullet tank T554: (12/08)

SPECIAL CONDITIONS

Permit Number 4802/PSDTX1260

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A maximum of two shutdowns, degassing, and cleaning events can be conducted for Tanks F2, F3, and T554 and two shutdowns, degassing, and cleaning events for tanks the equivalent size of Tanks B1 or B2 and two shutdowns, degassing, and cleaning events for tank the equivalent size of H1 or H2 each calendar year. These tank MSS activities are limited to 840 hours per rolling 12 months.

Each tank will be degassed to EPN 104, prior to being drained and flushed. Each tank will be drained and flushed by water a minimum of three times and emissions must be routed to the Regeneration Unit No. 2 Industrial Furnace (EPN 104) until the VOC concentration is less than 400 ppmv. If the Industrial Furnace (EPN 104) is not available, then these emissions must be routed to the vapor combustor, EPN 120. The vapor combustor must achieve 98 percent control efficiency for VOC and the industrial furnace must achieve 99.9999 percent control efficiency for VOC. Any wastewater will be pumped into another hazardous waste storage tank and will be burned in the industrial furnace in Regeneration Unit No. 2 (EPN 104). The outlet VOC concentration from the tanks after final nitrogen purge shall be below 20 ppmv. The purge rate of the blower shall not exceed 500 CFM at ambient temperature.

- D. Catalyst converter planned MSS activity is limited to 218 hours per rolling twelve months from EPN CATSCNR2. Planned MSS generated particulate emissions shall be directed to a bag filter. Outlet bag filter grain loading shall be limited to a maximum of 0.01 grains per dry standard cubic foot. (02/12)
- E. Only these planned MSS activities described in this condition are authorized by this permit. These emissions are subject to the maximum allowable emission rates indicated on the maintenance, start-up, and shutdown (MAERT). The performance of each planned maintenance activity and emissions associated with it shall be recorded and the rolling 12-month emissions shall be updated on a monthly basis. These records shall include at least the following information: (02/12)
 - (1) the physical location at which emissions from the planned MSS activity occurred, including the emission point number, common name, and any other identifier for the point at which the emissions were released into the atmosphere;
 - (2) the type of planned MSS activity and the reason for the planned activity;
 - (3) the common name and the facility identification number of the facilities at which the planned MSS activity and emissions occurred;

SPECIAL CONDITIONS

Permit Number 4802/PSDTX1260

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- (4) the date and time of the planned MSS activity and its duration;
 - (5) the estimated quantity of each air contaminant, or mixture of air contaminants, emitted with the data and methods used to determine it.
- The emissions shall be estimated using the methods identified in the amendment application, PI-1 dated December 15, 2006, December 17, 2007 and May 31, 2011, consistent with good engineering practice.

Process Fugitive Monitoring Programs

9. 28PI Piping, Valves, Pumps and Compressors in Spent H₂SO₄ and SO₂ Service (2/07)

- A. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National Standards Institute, American Petroleum Institute, American Society of Mechanical Engineers, or equivalent codes.
- B. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical.
- C. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation. Non-accessible valves, as defined in 30 TAC Chapter 115, shall be identified in a list to be made available upon request.
- D. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve. Except during sampling, the second valve shall be closed.
- E. All piping components shall be inspected by visual, audible, and/or olfactory means at least once a week by operating personnel walk-through.
- F. Damaged or leaking valves, connectors, compressor seals, and pump seals found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Every reasonable effort shall be made to repair a leaking component as specified in this paragraph within 15 days after the leak is found. If the repair of a component would require a unit shutdown, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot

SPECIAL CONDITIONS

Permit Number 4802/PSDTX1260

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tagging. At the discretion of the TCEQ Executive Director or designated representative, early unit shutdown or other appropriate action may be required based on the number and severity of tagged leaks awaiting shutdown.

- G. Date and time of each inspection shall be noted in the operator's log or equivalent. Records shall be maintained at the plant site of all repairs and replacements made due to leaks. These records shall be made available to representatives of the TCEQ upon request.

Piping, Valves, Connectors, Pumps and Compressors in VOC Service for Hazardous Waste Operations

- 10. The permittee shall comply with these requirements for all equipment items, except relief valves, which contact hazardous or specified non-hazardous wastes or vapors from these wastes:
 - A. All valves and piping shall be above ground and so located as to be reasonably accessible for leak checking during plant operation.
 - B. Piping connections shall be welded or flanged. Flanges and flange gaskets shall be of the design and quality that the potential for fugitive losses is minimized.
 - C. All pumps shall be sealless or equipped with double mechanical seals using an oil or water based barrier fluid which operates at a pressure higher than the process pressure.
 - D. All valves shall be designed, constructed, and tested by the manufacturer for leak-free performance.
 - E. New and reworked valves installed as replacements shall be tested prior to operation by hydrostatic or gas testing in-place or by an appropriate bench test to determine that the valves do not leak.
 - F. Prior to the initial burning of hazardous waste and annually thereafter, all pumps, valves, and flanges shall be hydrotested or gas-tested at 100 percent or more the maximum operating pressure and adjustments made as necessary to obtain bubble-tight, leak-free performance.
 - G. All pumps, valves, and flanges shall be monitored monthly with a hydrocarbon gas analyzer. Monitored values which are greater than 25 parts per million (ppm) above any background concentration when measured at a distance of less than three inches shall be considered evidence of a leak.

SPECIAL CONDITIONS

Permit Number 4802/PSDTX1260

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- (1) In lieu of the monthly monitoring frequency specified in Special Condition No. 9G, pumps, valves, and flanges may be monitored on a quarterly basis if the leak percentages of these components for three consecutive monthly monitoring periods is less than 0.2 percent.

If the leak percentage for any quarterly monitoring period is 0.2 percent or greater, the facility shall revert to monthly monitoring for pumps, valves, and flanges until the facility again qualifies for the alternative monitoring schedules previously outlined in this paragraph.

- (2) The leak percentage shall be determined by using the following formula:

$$(Cl_1 + Cs_1) \times 100 / Ct_1 = Cp_1$$

Where:

Cl_1 = the number of pumps, valves, and flanges found leaking by the end of the monitoring period.

Cs_1 = the number of pumps, valves, and flanges for which repair has been delayed and are listed on the facility shutdown log.

Ct_1 = the total number of pumps, valves, and flanges in the facility subject to the monitoring requirements, as of the last day of the monitoring period.

Cp_1 = the percentage of leaking pumps, valves, and flanges for the monitoring period.

H. All agitator seals shall be monitored monthly with a hydrocarbon gas analyzer. Monitored values which are greater than 25 ppm above any background concentration when measured at a distance of less than three inches shall be considered evidence of a leak.

- (1) In lieu of the monthly monitoring frequency specified Special Condition No. 9H agitator seals may be monitored on a quarterly basis if the leak percentages of these components for three consecutive monthly monitoring periods is less than 0.2 percent.

SPECIAL CONDITIONS

Permit Number 4802/PSDTX1260

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If the leak percentage for any quarterly monitoring period is 0.2 percent or greater, the facility shall revert to monthly monitoring for agitator seals until the facility again qualifies for the alternative monitoring schedules previously outlined in this paragraph.

- (2) The leak percentage used in paragraph H(1) shall be determined using the following formula:

$$(Cl_2 + Cs_2) \times 100 / Ct_2 = Cp_2$$

Where:

Cl_2 = the number of agitator seals found leaking by the end of the monitoring period

Cs_2 = the number of agitator seals for which repair has been delayed and are listed on the facility shutdown log.

Ct_2 = the total number of agitator seals in the facility subject to the monitoring requirements, as of the last day of the monitoring period.

Cp_2 = the percentage of agitator seals for the monitoring period.

- I. All agitator seals, pumps, valves, and flanges shall be inspected on a daily basis and shall be monitored if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method. Monitored values which are greater than 25 ppm above any three inches shall be considered evidence of a leak. Visible presence of the leaking waste liquid shall always constitute a leak and, therefore, will not necessitate the use of a monitor for detection purposes.
- J. Two continuous ambient hydrocarbon monitors shall be installed, maintained and operated around the perimeter of each of the storage modules for the purpose of identifying fugitive leaks. Each monitor shall alarm at: (4/07)
- (1) Calculated hourly averages above 25 ppm; or
 - (2) An instantaneous value above 25 ppm; and
 - (3) An alarm shall result in both an immediate search for leaking equipment by personnel using portable monitors and a written record of the conclusion of that search.

If the hourly average remains above 25 ppm and the initial search was negative, additional searches need not be conducted except on 24-hour intervals.

Alternate, equivalent methods or additions to these required methods for identifying fugitive leaks may be approved by the Executive Director of the TCEQ upon written request by the permittee.

Hand held monitors meeting Method 21 monitoring requirements can be used to monitor for process fugitive leaks during periods when the hydrocarbon monitors are out of service.

- K. Leaking equipment shall be repaired or isolated within four hours after detection, except for valves connected directly to tanks, which are allowed four hours after the affected tank has been emptied and decontaminated. Emptying and decontamination of the affected tank shall be initiated immediately after the detection of a leak. Equipment shall not be returned to service until the leak is repaired.
- L. The repair and maintenance of any equipment component shall be assisted by use of a hydrocarbon gas analyzer such that a minimum concentration of leaking hydrocarbons is achieved and that the resulting concentration is less than 25 ppm above any background concentration when measured at a distance of less than three inches. An acceptable alternative of demonstrating VOC to be less than 25 ppm is to pressure test with nitrogen up to 125 pounds per square inch. If there is no drop in pressure over a 15 minute period, the equivalent 25 ppm threshold is satisfied.
- M. The holder of this permit shall operate and maintain all portable hydrocarbon gas analyzers to meet the performance specifications, field tests, and calibrations as found in 40 CFR § 264.1063. Alternate, equivalent equipment items, operating modes, and maintenance activities may be approved by the Executive Director of the TCEQ upon written request by the permittee.
- N. Records of monitoring and maintenance actions, required by the Special Condition No. 9 of this permit shall be maintained for a period of three years, shall be made available to authorized state and local air pollution control agencies, and shall include, at a minimum, the following data:
 - (1) A list of all components affected by this special condition;
 - (2) Checklists indicating the daily inspections are being performed;
 - (3) Checklists indicating the monthly inspections are being performed;

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- (3) Checklists indicating the monthly inspections are being performed;
- (4) Checklists indicating the annual inspections are being performed;
- (5) Checklists indicating the continuous ambient monitors are being operated and maintained;
- (6) Summaries including the date, time, equipment identification, and monitoring results for all leaking items;
- (7) Summaries including the date, time, equipment identification, and corrective actions for all isolations, replacements and/or repairs performed, including monitoring results immediately after repairs; and
- (8) Records of the calibration of the portable and continuous monitoring instruments.

(Note: Checklist and summaries may be computerized but shall be verified by signed writing confirming that the required checks were completed.)

Vapor Combustor

- 11. A. Vents from Fixed-Roof Storage Tanks designated as B1, B2, F2, F3, H1, H2 and Tank 554 and hazardous waste truck and railcar depressurizations shall vent to the Regeneration No. 2 Furnace designated as EPN 104 when it operates and these tank vents and depressurizations shall be directed to the Vapor Combustor designated as EPN 120 up to 1,314 hours per rolling 12 months when EPN 104 is not operable. (12/08)
- B. The MSS emissions (two shutdowns, degassing, and cleaning events per calendar year) from Tanks F2, F3, and T554 and the MSS emissions (two shutdowns, degassing, and cleaning events per calendar year) for the equivalent size Tanks B1 or B2 and MSS emissions (two shutdowns, degassing, and cleaning events per calendar year) for the equivalent size Tanks H1 or H2 shall vent to the Regeneration Unit No. 2 Furnace designated as EPN 104 when it operates and shall be directed to the Vapor Combustor designated as EPN 120 when EPN 104 is not operable. These tank MSS activities are limited to 840 hours per rolling 12 months. (12/08)
- 12. Vents from Tanks 48, 49, 53 and 56 and spent tank truck depressurizations shall be vented to the Regeneration No. 2 Furnace designated as EPN 104 when it operates and these tank vents and depressurizations shall be directed to the Vapor Combustor designated as EPN 170 up to 1,314 hours per rolling 12-months when EPN 104 is not operable. A maximum of four tank trucks can be depressurized in one hour to the represented emission controls. (4/07)

Storage Tank Vent 78 and spent railcar depressurizations shall vent to the No. 2 Regeneration Furnaces designated as EPN 104 and can be directed to the caustic scrubber and then routed to the Vapor Combustor designated as EPN 170 when the No. 2 Regeneration Furnace is down up to 1,314 hours per calendar year. The caustic scrubber outlet vent shall be directed to the inlet of EPN 170. (3/06)

13. Each Vapor Combustor designated EPNs 120 170 and the portable vapor combustor designated as EPN TKINSPMSS2 shall be equipped with a continuously burning pilot system or other automatic ignition system that assures combustor ignition and that provides immediate notification of appropriate supervisory personnel when the ignition system ceases to function properly. (4/07)

Initial Determination of Compliance

14. Sampling ports and platform(s) shall be incorporated into the design of the Vapor Combustor Stack designated as EPN 170 and Regeneration Unit No. 2 Stack designated as EPN 104 according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities." Alternate sampling facility designs may be submitted for approval by the TCEQ Regional Director. (02/12)
15. The holder of this permit shall perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the Vapor Combustor (EPN 170) and Regeneration Unit No. 2 Stack (EPN 104). The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. (02/12) (PSD)
 - A. The appropriate TCEQ Regional Office in the region where the source is located shall be contacted as soon as testing is scheduled, but not less than 45 days prior to sampling to schedule a pretest meeting.

The notice shall include:

- (1) Date for pretest meeting,
- (2) Date sampling will occur,
- (3) Name of firm conducting sampling,
- (4) Type of sampling equipment to be used, and
- (5) Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

A written proposed description of any deviation from sampling procedures specified in permit conditions or the TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Director shall approve or disapprove of any deviation from specified sampling procedures. Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Air, Air Permits Division. Test waivers and alternate/equivalent procedure proposals for New Source Performance Standards testing, which must have the EPA approval, shall be submitted to the TCEQ Regional Director.

- B. Air contaminants emitted from the Vapor Combustor (EPN 170) to be tested for include (but are not limited to) VOC.

Air contaminants emitted from the Regeneration Unit No. 2 Stack (EPN 104) to be tested for include (but are not limited to) CO, H₂SO₄ mist, NO_x, PM and SO₂. These stack testing results shall be used to demonstrate compliance with Special Condition Nos. 1 and 3. Stack testing of EPN 104 shall be completed between 90 days and 180 days after installation of the emission abatement equipment required by Special Condition No. 3. **(02/12) (PSD)**

- C. Sampling shall occur at such other times as may be required by the Executive Director of the TCEQ. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office. Additional time to comply with the applicable requirements of 40 CFR Part 60 and 40 CFR Part 61 requires the EPA approval, and requests shall be submitted to the TCEQ Regional Director.
- D. The plant shall operate at maximum production (or loading) rates during stack emission testing. The stack test will be conducted under the combination of the maximum conditions as identified in the MAERT as Vapor Combustor 2-Normal plus Vapor Combustor 2-Standby (maintenance). Primary operating parameters that enable determination of production rate (or loading rate) and combustor operating parameters shall be monitored and recorded during the stack test. These parameters are to be determined at the pretest meeting. If the plant is unable to operate at maximum rates during testing, then future production (or loading) rates may be limited to the rates established during testing. Additional stack testing may be required when higher production rates are achieved. The combustor operating parameters during testing shall be used to set the normal operating conditions until the next stack test is performed.

The sulfuric acid plant shall be sampled while operating at the maximum possible safe production rate (as determined by the permittee) for the H₂SO₄ Regeneration Unit No. 2 at the time of testing for EPN 104. This H₂SO₄ production rate shall be monitored and recorded during the stack test of EPN 104. If the normal production rate of H₂SO₄ from the Regeneration Unit No. 2 exceeds by more than 10 percent the tons per day maintained during sampling of EPN 104, the permit holder must notify, in writing, the appropriate TCEQ Regional Office, and the source may be subject to additional sampling to demonstrate continued compliance. (02/12) (PSD)

- E. Sampling reports shall comply with the attached provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. One copy of the final sampling report shall be distributed as follows within 60 days after sampling is completed. (02/12) (PSD)

The appropriate TCEQ Regional Office; each applicable local air pollution control program, and EPA Region 6 New Source Review in Dallas (EPN 104 only)

- F. A written proposed description of any deviation from sampling procedures specified in permit conditions or the TCEQ or EPA sampling procedures and any written contact as soon as testing is scheduled, but not less than 45 days prior to sampling to schedule a pretest meeting shall be sent to each applicable local air pollution control program with jurisdiction in conjunction with paragraph A of this special condition. Requests for additional time to perform sampling in conjunction with paragraph C of this special condition shall be sent to each applicable local air pollution control program with jurisdiction.

Continuous Demonstration of Compliance

16. The industrial furnace shall not emit non-sulfate particulate matter in excess of 0.02 grain per dry standard cubic feet when corrected for the amount of oxygen in the stack gas in accordance with the formula specified in 40 CFR § 264.343(c). Corrections for the amount of sulfate particulate in the stack gas shall conform to the procedures specified in the TCEQ Laboratory Methods Manual.
17. The following requirements apply to capture systems for EPN 104 emitting SO₂. (02/12)
- A. The permit holder shall conduct a once a month visual, audible, and/or olfactory inspection of the capture system to verify there are no leaking components in the capture system;
- B. The control device shall not have a bypass.

- C. If any of the above inspections are not satisfactory, the permit holder shall promptly take necessary corrective action.
18. The minimum liquid flow to the absorber (EPN 104) shall be 200 gallons per minute (gpm). The circulation rate shall be monitored and recorded at least once a day. **(02/12) (PSD)**

The liquid flow rate shall be recorded at least once an hour.

The flow monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least annually, whichever is more frequent, and shall be accurate to within 2 percent of span or 5 percent of the design value.

The minimum pH on the second stage of the scrubber's scrubbing solution downstream of the Brinks mist filter is 5.0. This pH shall be analyzed and recorded at least once a day.

Each monitoring device shall be cleaned with an automatic cleaning system, or cleaned weekly using hydraulic, chemical, or mechanical cleaning. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least weekly, whichever is more frequent, and shall be accurate to within 0.5 pH unit. Quality-assured (or valid) data must be generated when the facility generating emissions are operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in hours) that the facility generating emissions operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgement and the methods used recorded.

19. The holder of this permit shall install, calibrate, maintain and operate a continuous emission monitoring system (CEMS) to measure and record the in-stack concentration of SO₂ and the total gas flow rate from the Regeneration Unit No. 2 Stack (EPN 104) on and after April 1, 2014. **(02/12) (PSD)**
- A. The CEMS calibration shall be checked daily and the CEMS shall be zeroed and spanned using cylinder gas at least once a week and corrective action taken when the results differ by greater than ± 5 percent from the tagged cylinder gas value.

- B. The monitoring data shall be reduced to one-hour average concentrations at least once every month using a minimum of four equally spaced data points from each one-hour period. The individual average concentrations shall be reduced to units of the permit allowable emissions rates in pounds of SO₂ per hour at least once every month.
- C. All monitoring data and quality assurance data shall be maintained by the source for a period of two years and shall be made readily available to TCEQ personnel, EPA personnel or any local program with jurisdiction upon request. The data from the CEMS may, at the discretion of the TCEQ, EPA personnel or any local program with jurisdiction, be used to determine compliance with the SO₂ emission limits specified in MAERT.
- D. The CEMS must operate at all times when sulfur bearing compounds (except natural gas) are being fed to the furnace, but need not operate during CEMS breakdown, repairs for calibration checks and zero span adjustments. (02/12)
- E. The CEMS shall be used to demonstrate compliance with the SO₂ emission limits as found in Special Condition No. 3. The permit holder must meet the quality assurance procedures required by 40 CFR Part 60 Appendix F or any alternate procedures specified in the Alternate Monitoring Plan (Attachment A). (02/12)
 - (1) The SO₂ CEMS shall monitor and record the three hour arithmetic average (not weighted by production volume) SO₂ emission rate in units of pounds per ton of one hundred percent acid produced.
 - (2) The SO₂ CEMS shall monitor and record the SO₂ emission rate averaged (arithmetic average, not weighted by production) over all operation hours in each 365 day period in units of pounds per ton of one hundred percent acid produced.
 - (3) Implementation of the monitoring requirements has been defined in the Alternate Monitoring Plan (AMP) for the SO₂ CEMS system.
 - (4) The AMP supersedes the corresponding SO₂ monitoring requirements of NSPS Subpart H.
 - (5) All steps necessary to avoid CEMS breakdowns and minimize CEMS down time must be taken. This shall include, but is not limited to, operating and maintaining the CEMS in accordance with best practices and maintaining an on-site inventory of spare parts or other supplies necessary to make rapid repairs of the equipment.
 - (6) In the event of CEMS downtime lasting longer than twenty-four hours, the permittee shall demonstrate compliance with the emission limits established in Special Condition No. 3 according to the procedures specified in the AMP.

Dated: February 10, 2012

ATTACHMENT A
Alternative Monitoring Plan for SO₂ Emissions
Rhodia Inc. Houston, TX Unit 2
Single Absorption Sulfuric Acid Regeneration Plant with Scrubber

Justification for Using an Alternative Monitoring Plan (AMP) for SO₂ emissions

The regulations that established the NSPS for sulfuric acid plants are over 30 years old. At the time, the regulatory standard was established as 4 lb of SO₂ emissions per ton of 100 % sulfuric acid produced, and compliance with the standard was to be demonstrated using a calculation similar to Equation 1 below. Regulations required the use of a CEMS to measure SO₂ concentration at the stack (M2), but only required measurement of SO₂ entering the converter by suitable method three times per calendar day. Plants typically rely on the use of a Reich test once per shift to establish the SO₂ concentration entering the converter (M1). While the stack measurement represented a nearly continuous real time indication of the stack concentration, performing a Reich test once per shift for the converter inlet concentration provides little more than a random sample once every eight hours.

The methodology proposed in this AMP will provide a more continuous real-time indication of compliance by using a process analyzer to measure the converter inlet SO₂ concentration. While this analyzer will be nearly identical to the CEMS that is commonly used at the stack, it will not be able to meet all of the standards that are usually applied to a CEMS because of the process conditions and / or physical limitations of an existing facility. For example, it is not feasible to modify the existing ductwork around the analyzer to meet the normal guidelines for straight runs of pipe upstream / downstream of the analyzer. We believe that the disadvantages (places where the analyzer is not quite up to CEMS standards) are far outweighed by the advantages of using a real time instrument, rather than a periodic Reich test, to measure the converter inlet concentration. Rhodia will use best professional judgment to ensure the analyzer located at the converter inlet provides representative data.

Except as noted in this document, the objective of this proposed AMP is to maintain the process analyzer at the converter inlet in a manner that is similar to the stack CEMS, as set forth in 40 CFR Part 60, Appendix B and F.

Definitions

"CEMS" or "Continuous Emission Monitoring System" shall mean equipment that continuously measures and records the concentration and/or emission rate of a pollutant, in the units specified by the emission limit concerned

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"Long-Term Limit" shall mean a sulfur dioxide (SO₂) emission limit for a sulfuric acid plant expressed as pounds per ton of 100% sulfuric acid produced ("lbs/ton"), averaged over all Operating Hours in a rolling 365-day period.

"Malfunction" shall mean, consistent with 40 C.F.R. § 60.2, any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner, but shall not include failures that are caused in part by poor maintenance or careless operation.

"Operating Hours" shall mean periods during which sulfur or sulfur-bearing compounds, excluding conventional fossil fuels such as natural gas or fuel oil, are being fed to the furnace.

"Short-Term Limit" shall mean the SO₂ emission limit for each sulfuric acid plant expressed as pounds per ton of 100% sulfuric acid produced ("lbs/ton"), averaged over each rolling 3-hour period. Except for periods of Startup, Shutdown and Malfunction, the Short-Term Limits established under this Consent Decree shall apply at all times.

"Shutdown" shall mean the cessation of operation of a sulfuric acid plant for any reason. Shutdown begins at the time sulfur or sulfur-bearing feeds, excluding conventional fossil fuels such as natural gas or fuel oil, to the furnace ceases.

"Startup" shall mean the 24-hour period at any sulfuric acid plant beginning when the feed of sulfur or sulfur-bearing materials, excluding conventional fossil fuels such as natural gas or fuel oil, to the furnace commences after a main gas blower shutdown.

Part 60.84 Emissions Monitoring.

Compliance with the Long-Term Limit and Short-Term Limit defined by the Consent Decree will be demonstrated using SO₂ analyzers at the converter inlet and exit stack using the following equation. Refer to additional discussion below the equation for specific details related to data input and calculation.

Equation 1

$$Xe = (M1 - M2) / (M1 - 1.5 \times M1 \times M2)$$

$$E = (K / Xe) - K$$

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Where:

Xe = fractional conversion efficiency

M1 = fractional concentration of SO₂ entering the converter

M2 = fractional concentration of SO₂ at the stack

E = SO₂ emission rate in lb / ton of 100 % acid produced

K = 1306 = (2000 lb / ton) x (64 lb / lbmol SO₂) / (98 lb / lbmol H₂SO₄)

Short-Term Limit

The following procedure and calculation will be performed once every five minutes during all Operating Hours, except periods of Startup, Shutdown or Malfunction, to demonstrate compliance with the Short-Term Limit for SO₂.

- At any given time the system will maintain an array consisting of the 36 most recent samples of the SO₂ concentrations at the converter inlet and at the exit stack.
- Once every five minutes, the system will sample the latest SO₂ concentrations, add the recent readings to the array and delete the oldest readings. If the unit is not operating then the array of data will not change.
- M1_{3hravg} will then be calculated as the arithmetic average of the 36 most recent data samples for the fractional concentration of SO₂ entering the converter (M1_{3hravg}).
- M2_{3hravg} will then be calculated as the arithmetic average of the 36 most recent data samples for the fractional concentration of SO₂ at the stack (M2_{3hravg}).
- The rolling 3 hour average SO₂ emissions (E_{3hravg}) will then be calculated per Equation 2.

Equation 2 (rolling 3 hour average SO₂ emissions)

$$Xe_{3hravg} = (M1_{3hravg} - M2_{3hravg}) / (M1_{3hravg} - 1.5 \times M1_{3hravg} \times M2_{3hravg})$$

$$E_{3hravg} = (K / Xe_{3hravg}) - K$$

- The production unit will be deemed to be operating in compliance with the Short Term Limit if E_{3hr-avg} does not exceed 3.0 lb of SO₂ per ton of 100% sulfuric acid produced during all Operating Hours except periods of Startup, Shutdown or Malfunction.

During routine calibration checks and adjustments of the SO₂ monitors, the SO₂ measurement will be "frozen" at its pre-calibration level. Refer to System Maintenance and Malfunction for guidance during CEMS malfunctions, breakdowns, and repairs.

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Long-Term Limit

The following method will be used to calculate the daily average lb of SO₂ per ton of 100% sulfuric acid, and the number of Operating Hours for the calendar day.

- Once every five minutes during all Operating Hours, the SO₂ concentrations (converter inlet and exit stack) will be sampled and this time will be counted as five operating minutes. If the unit is not operating, then the SO₂ concentrations will not be sampled.
- The daily average will be calculated as follows for each calendar day:
 - o M1_{daily avg} will be calculated as the arithmetic average of the sample population for the fractional concentration of SO₂ entering the converter.
 - o M2_{daily avg} will be calculated as the arithmetic average of the sample population for the fractional concentration of SO₂ at the stack
 - o E_(daily avg) will then be calculated using Equation 3.

Equation 3 (daily average SO₂ emissions)

$$X_{e \text{ daily avg}} = (M1_{\text{daily avg}} - M2_{\text{daily avg}}) / (M1_{\text{daily avg}} - 1.5 \times M1_{\text{daily avg}} \times M2_{\text{daily avg}})$$

$$E_{\text{daily avg}} = (K / X_{e \text{ daily avg}}) - K$$

- o The number of operating minutes for the day will be summed (T_{day}.)
- o E_{dayavg} and T_{day} will be used to calculate a 365-day rolling average of lb/ton. The daily averages will be weighted by the number of operating minutes per day, as per Equation 4.

Once the system has been in operation for 365 days, compliance with the Long Term Limit (365-day rolling average) SO₂ emission rate will be calculated using Equation 4.

Equation 4

$$E_{365 \text{ avg}} = \frac{\sum [E_{\text{dayavg}} * T_{\text{day}}]}{\sum T_{\text{day}}}$$

The production unit will be deemed to be operating in compliance with the Long-Term Limit if E_{365avg} does not exceed 1.8 lb of SO₂ per ton of 100% sulfuric acid produced during all Operating Hours

During routine calibration checks and adjustments of the SO₂ monitors, the SO₂ measurement will be "frozen" at its pre-calibration level. Refer to System Maintenance and Malfunction for guidance during CEMS malfunctions, breakdowns, and repairs:

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Pt. 60.84 Emissions Monitoring Pt. 60, App. B, Spec. 2, Section 6.0 (Stack and Converter Inlet Analyzers)

Rhodia proposes to use the following stack analyzer specifications to satisfy the requirements of Pt. 60.84 and Pt. 60, App. B, Spec. 2, Section 6.0. The stack analyzer span must be capable of accommodating elevated emissions during startup. Specifications for the analyzer located at the converter inlet are based on Rhodia's experience with process analyzers at these locations.

An equivalent analyzer may be substituted for any reason.

Location	Manufacturer	Model Number	Range
Stack	Ametek Photometric Analyzer (or equivalent)	920 (or equivalent)	Dual range: Normal: 0 – 500 ppm SO ₂ SSM: 0 – 3,600 ppm SO ₂
Converter Inlet	Ametek Photometric Analyzer (or equivalent)	920 or IPS-4 (or equivalent)	Single range: 0 – 15 % SO ₂

Pt. 60, App. B, Spec. 2, Section 1.0 (Stack and Converter Inlet Analyzers)

Initial compliance certification required only if the analyzer is replaced or if system modifications require one to be performed. Additional detail and exceptions noted below under System Modifications below.

Pt. 60, App. B, Spec. 2, Section 8.0 (Converter Inlet Analyzer)

Rhodia will select the optimum location to obtain representative SO₂ readings from this location. Turbulence near the blower exit and elevated temperature at the converter inlet may require an analyzer measurement location that differs from the requirements of this section (e.g. pollutant stratification). A pollutant stratification test is not warranted for this application because (a) process conditions make it extremely unlikely that stratification could occur, and (b) the samples obtained under this monitoring plan are the same as would be obtained under the NSPS, except that the instrument will typically take 288 samples per day rather than the 3 required by the NSPS. Therefore, no new stratification risk is introduced by this method, but the instrument will typically take about 100 times as many samples.

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Pt. 60, App. B, Spec. 2, Section 16.0 (Converter Inlet Analyzer)

Rhodia will use the Alternative Relative Accuracy Procedure provided in Section 16.2.1 (i.e. conduct a cylinder gas audit).

Pt. 60, App. F, Spec. 2, Section 5.0 (Converter Inlet Analyzer)

Rhodia will use quarterly cylinder gas audits (i.e. four per year) to satisfy the requirements of this section.

System Maintenance and Malfunction

Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the plant shall conduct monitoring in continuous operation during all Operating Hours as defined above

In the event of a CEMS malfunction of greater than 24 hours:

- Exit stack gas will be sampled and analyzed at least once per hour, during all Operating Hours. Sampling will be conducted by Reich test or other method (e.g. portable analyzer).
- Converter inlet gas will either be sampled, or estimated using engineering judgment, at least once every four hours during all Operating Hours.
- Compliance with the Short-Term Limit and Long-Term Limit shall be verified by using these data and Equations 2, 3, and 4 with the following exceptions. If the stack CEMS is out of service, the most recent hourly reading will be substituted for the 12 five-minute readings that would otherwise be taken if the system was operating normally. Similarly, if the converter inlet SO₂ analyzer is out of service, the most recent four-hour reading will be substituted for the 48 five-minute readings that would otherwise be taken if the system was operating normally.

In the event of an analyzer malfunction, a like-kind replacement may be used while repairs are being made. A cylinder gas audit (CGA) must be performed on the replacement analyzer as soon as is practicable after it is placed in service. The daily calibration drift requirement would also apply to the replacement analyzer.

System Modifications

Significant replacement, modification, or change in certified CEMS equipment may require a complete recertification. If a recertification is required, it will be conducted within 90 days. Examples include:

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- Change in location or orientation of the sampling probe or site
- Complete replacement of an existing continuous emission monitoring system.

When replacing components that can alter the physical characteristics or conditioning of the sample in the field, a CGA is required. The following activities will require a CGA to be performed before returning the analyzer to service.

- Replacement of the analyzer
- Detector replacement
- Replacement of equipment associated with the detector

The following activities are not expected to trigger a CGA. However, it is recommended that a Calibration Drift check be performed before returning to service.

- Filter replacement
- Data Recorder Repairs
- Tubing replacement

General guidance: When replacing components or devices that do not affect the physical characteristics or handling of the gas in the field such as data recorders, a CGA is not required. A calibration drift check normally should be conducted. If the repaired component affects the transport of the gas to the analyzer, such as replacing tubing, a leak check should be conducted.

Alternative Monitoring System

The monitoring system proposed in this Alternative Monitoring Plan is expected to be a significant improvement over the monitoring requirements contained in the NSPS for sulfuric acid plants. However, the real-time calculation of SO₂ emissions is dependent upon the use of an SO₂ analyzer in the inlet duct to the converter, and the maintenance of that analyzer to approximately the same performance standards normally applied to the stack SO₂ CEMS. This is an unproven application of this technology, and there is some risk that the converter inlet SO₂ analyzer will not be able to perform as required despite the best efforts of Rhodia and the instrument manufacturer.

If Rhodia and the instrument manufacturer are unable to make the system operate to the indicated standards because the converter inlet SO₂ analyzer is unreliable and / or inaccurate in this application, then Rhodia will promptly notify EPA Region 6, and TCEQ of its determination and proceed as follows:

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- Rhodia will immediately begin meeting its SO₂ emissions monitoring requirements in accordance with 40 CFR Part 60, Subpart H, except that the SO₂ concentration at the converter inlet will be analyzed six times per day rather than the three times per day specified in the regulations.
- Rhodia will provide whatever information is requested by EPA regarding the determination that the converter inlet SO₂ analyzer can not meet the necessary performance standards.
- Rhodia will work with EPA to determine whether real time measurement of SO₂ emissions (in lbs / ton of acid) can be readily accomplished through other means without the use of an SO₂ analyzer at the converter inlet.

Dated February 10, 2012

APPROVED CHEMICAL LIST FOR HAZARDOUS WASTE OPERATIONS

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Acetaldehyde	Ash
Acetic Acid	Atrazine*
Acetic Anyhdride	Auramine
Acetone	Azeo Oil
Acetone Cyanohydrin	
Acetonitrile	Barium*
Acetophenone	Barium Sulfate
2-acetylaminofluorene	Bendocarb
Acetyl Chloride	Benz(a)anthracene
Acetylsalicylic acid	Benz(a)pyrene*
Neo Acid Anhydrides	Benz(c)acridine
Acrolein*	Benzaldehyde
Acrylamide (solid)	Benzamide,3,5-dichloro-N-
Acrylonitrile*	(1,1-dimethyl-2-propynyl)
Acrylic Acid	Benzyl mercaptan
Adipic acid	Benzene*
Adiponitrile	Benzene,1,1-(2,2-dichloroethylidene)bis
Aldrin	[4-chloro-]
Alicarb	Benzenediamine
Aliphatic Carboxylic Acid	Benzenethanamine,alpha,alpha-dimethyl-
Aliphatic Hydrocarbons	Benzene Hexchloride
Alkenyl Caroxylate	Benzene Sulfonyl Chloride
Allyl Alcohol	Benzidine (solid)
Alpha Methylstyrene	Benzonitrile
Alpha Naphtylamine	Benzo (RST) pentaphene
Alpha Naphthylthiourea	Benzo (a) pyrene
2-(2-Aminoethoxy)Ethanol	Benzo (a) phenanthrene
4-aminophenol	Benzotriazobenzotriazole
Aminoethyl Ethanolamine	Benzoic Acid
tris(hydroxymethyl)aminomethane	p-Benzoquinone*
Amitrole (solid)	2-(2-hydroxy-3,5 di-(tert)amylphenol)
Ammonia	benzotirazole
Ammonium Hydroxide	Benzotrichloride
Ammonium Nitrate*	Benzoyl Chloride
Ammonium Polysulfide	Benzyl Chloride*
Ammonium Procrate, dry	Beryllium
t-Amyl Hydroperoxide	Biodiesel
Aniline*	Biphenyl*
Anthracene*	Bipyridyl
Anthroquinone	Bis(2-chloroethoxy)methane
Antimony*	Bishexamethylenediamine
Aromatic Naphtha	Bis(methylthio)methane
Arsenic*	Boron
Arsine*	Bromoacetone, liquid

APPROVED CHEMICAL LIST FOR HAZARDOUS WASTE OPERATIONS

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Bromoform (tribromomethane)

Bromomethane (methyl bromide)

Brucine (solid)

Butadiene polymer

Butadiene tar

n-Butyl Acetate

Butyraldehyde*

Butyl Ether

n-Butyl Formate

n-Butyl Propionate

1,3 Butadiene

n-Butane

1,4 Butanediol

Butanol

2-Butanol

n-butanol

t-butanol

1-Butene

cis-3 Butene

2-methyl-1-butene

n-butyl acetate

Butyl Acrylate

sec-butyl alcohol

Butylcellosolve

t-Butyl Hydroperoxide*

n-Butylmercaptan

1,3-Butylene Glycol

2-butyne-1,4-diol (BYD)

1,4-butyndiol

Butyric Acid*

2-methyl butyric acid

C-4

Cacodylic Acid

Camphechlor

Carbaryl (solid)

Carbon Bisulfide

Carbon Disulfide*

Carbon Tetrachloride

Castor Oil

Catechol

Chloral, anhydrous, inhibited

Chlordane

Chlorinated Polyisobutylene

Chloroacetaldehyde

Chloroaniline-p

Chlorobenzene

1,2,4,5-tetrachlorobenzene

Chlorobenzilate

1-Chlorobutane

2-chloroethyl vinyl ether

Chloroform

Bis (2-chloro-1-methylethyl) ether

Chloromethane

(Chloromethyl) ether, bis

Chlormethyl methyl ether

Chloronaphazine

2-chloronaphthalene

o-Chlorophenol

2,6-dichlorophenol

Chromium*

Chrysene*

Coal tar

Creosote

Cresol

m-cresol

4-chloro-m-cresol

p-cresol

Crotonaldehyde

Cumene Hydroperoxide

di-tert-butyl-para-Cresol

Cumene

Cumene Hydroperoxide

p-Cumyl Phenol

Cyanogen Bromide

Cyanogen Chloride with less than 0.9% water

Cyanogen Gas

1,3,6-tricyanohexane

Cyclohexane

Cyclohexanone

Cyclooctadiene

Cyclophosphamide

Copper*

Creosote*

Crotonaldehyde*

Cyclohexyl Amine*

Cyclopentadiene

APPROVED CHEMICAL LIST FOR HAZARDOUS WASTE OPERATIONS

Permit Number 4802/PSDTX1260

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Daunomycin	Diisobutylene
DDT	Dimethoate
Diacetone Alcohol	Dimethoxybenzidine-3,3
Dialkyl Disulfide Oil	Dimethylamine
Dibenz (A,H) anthracene	p-dimethylaminoazobenzene
Dibromomethane	Dimethylaminoethoxyethanol
Dibromomethane-1,2	Dimethylbenz(a)-anthracene-7,12
Dibutylphthalate	Dimethylbenzene
Dicamba	Dimethylbenzidine-3,3
o-Dichlorobenzene	(1,3-dimethylbutyl)-N-phenyl
m-Dichlorobenzene	Dimethylcarbamyl Chloride
p-Dichlorobenzene (solid)	Dimethyl Disulfide
Dichlorobenzidine-3,3 (solid)	Dimethylethanolamine*
Dichlorobutene	Dimethylformamide
Dichloro-1,4, butene-2	Dimethylhydrazine, unsymmetrical
1,2-Dichloroethane	Dimethylmethylaminoethoxy ethaneamine
trans-1,2-dichloroethene	Dimethylphenol -2,4
Dichloroethyl ether	(1,4-dimethylphenyl)-N-phenyl
Dichlorodifluoromethane	Dimethyl Phthalate
Dichloromethane	Dimethyl Siloxane
Dichlorophenol-2,4	Dimethyl Sulfate
2,4 Dichlorophenoxy Acetic Acid	Dimethyl Sulfide
Dichloropropylene-1,3	Dimethyl Sulfoxide
Dicyanoethylamine	Dimethyl Disulfide*
Dicyclopentadiene	Dimethyl Formamide (DMF)
Dieldrin	1,2 Dimethoxybenzene
Diepoxybutane	Dimethoxyethane
Diethanolamine	Dimethyl Ether
Diethylaminoacetone	Dimethylaminopropylamine DMAPA
Diethyl Sulfide	Dimorphoxy Amino Glycol
Diesel Fuel	4,6 Dinitro-o-cresol*
Di(2-ethylhexyl)phthalate	Dinitrocyclohexylphenol
Diethylarsine	Dinitrotoluene-2,4
Diethyl Ether	Di-n-octyl Phthalate
Diethyl Ketone	Dinoseb
Diethyl Phthalate	Di-N-Propylamine
Diethylstilbestrol	Dioxane
Diethylene Glycol	Diphenyl Hydrazine-1,2
Diethylene Glycol Dimethyl Ether	Dipropylamine
Diethylene Glycol Monomethyl Ether	Dipropylene Glycol Methyl Ether
Diethylenetriamine	Disulfoton
Diglyme	Di-t-butyl Peroxide
2,3 dihydrofuran	Dithiobiuret
Dihydrosafrole	Dithiobiuret

APPROVED CHEMICAL LIST FOR HAZARDOUS WASTE OPERATIONS

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Diruon	2 Ethyl-1-Hexanol
Dodecane	2-Ethylhexanoic Acid
Dodecylbenzene	Ethyl mercaptan*
Dodecylbenzene alkylates	Ethylidene norbornene
Dodecyl Mercaptan*	Ethyl Propyl Acrolein
tert-dodecylmercaptan	Ethylsuccinonitrile
	Etoposide
Endosulfan	
Endrin	Facet 75 DF Herbicide
Epichlorohydrin*	Famphur
Epinephrine	Fatty Acids
1,2 ethanedithiol	Fludioxonil
Ethane,1,1,1,2-tetrachloro	Flumaric Acid
Ethanimidothioic acid, N-	Fluoroacetamide
[(methylamino)carbonyl[oxy]-methy ester]	Fluoranthene
Ethanol	Fluorosulfonic Acid
n-nitrosodiethanolamine	Fluorotrichloromethane
Ethoxy Ethanol	Fluorothene
Ethoxy Triglycol	Formaldehyde*
Ethyl Acetate	Formic Acid
Ethyl acrylate	No. 2 Fuel Oil
n-nitrosodiethylamine	Furan
Ethylbenzene	Furfural*
Ethyl Carbamate	
Ethyl Lactate	Gasoline
Ethyl Mercaptan	Gasoline Jet Fuel
Ethyl Methacrylate	Glutaric acid
Ethyl Methanesulfonate	2-methylglutaronitrile
Ethyl Methyl Ketone	Glycidaldehyde
Ethyl Parathion (solid)	Glycol Acetate
Ethyl trimethoxysilane	Glycol Diacetate
Ethylene	Grease
Ethylene Bromide	Guaiacol
Ethylene Dichloride	Guanidine, N-methyl-N'-nitro-N-nitroso-
Ethylene Imine, inhibited	
Ethylene Oxide*	HBM (2-hydroxisobutyric acid methyl ester)
Ethylene Thiourea (solid)	Heptachlor (solid)
Ethylidene Dichloride	Heptane
2-Ethylhexaldehyde	Heptanol
Ethyl Lactate	3-Heptanone
Ethylene Almine, inhibited	Hexachlorobenzene
Ethylene Diamine	Hexachloro-1,3-butadiene*
Ethylene Glycol	Hexachloroethane
Ethylene Oxide	Hexachlorocyclopentadiene

APPROVED CHEMICAL LIST FOR HAZARDOUS WASTE OPERATIONS

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Hexachlorophene	Ketone
Hexachloroprene (solid)	Keto/enol
Hexane	
1,6 hexamethylene diisocyanate*	Lasiocarpine
Hexamethylene-1,6-diisocyanate	Lead Acetate
Hexene	Lindane*
Hydraulic Oil*	Lube Oils
Hydrazine	
Hydrazine, 1,2-diethyl-	Magnesium Chloride
1,2-dimethylhydrazine	Malathion
Hydrazine Hydrate	Maleic Anhydride*
Hydrochloric Acid, liquid	Malononitrile
Hydrocyanic Acid, liquefied	Manganese*
Hydrogen Chloride*	Mefenoxam
Hydrogen Cyanide	Melphalan
Hydrogen Silesquioxane	Mercury
Hydrogen Sulfide	Methacrylonitrile
Hydroquinone	Methanethiol*
Hydroquinone Methyl Ether	Methapyrilene
2-hydroxyisobutyric acid methyl ether	Methomyl Intermediate (MHTA)
(HBM)	Methoxychlor (solid)
Hydroxylamine	Methoxydihdropyran, liquid
	n-(2-Methoxy;-Methylethyl)-2,4-dimethyl-
	2-amino-1-methoxypropane
	n-methylacetamide
	Methyl-3-13-(2H-benzotriazole-2-YL)-5-(tert)-
	butyl-4 hydroxy phenyl) propionate
	Methyl Chloride
	Methyl Chlorocarbonate
	Methyl Chloroform
	Methyl Cyclohexane
	Methyl Ethyl Ketone Peroxide
	Methyl Glutanoitrile
	2-Methylglutanronitrile
	1-Methoxy-2 Propanol
	2-Methoxy-1 Propanol
	Methyl Acetate
	Methyl Acrylate*
	Methyl Alcohol
	3-methylchlolanthrene
	Methyl Chlorocarbonate
	Methylcholanthrene-3
	n,n-bis-methylethyl
	Methyl Ethyl Ketone
Indene*	
Indeno (1,2,3-CD) Pyrene	
Iron Sulfate	
Isobutanol	
Isobutyl Acetate	
Isobutyraldehyde	
Isodecyl Alcohol	
Isooctane	
Isodrin	
Isopar E	
Isopar L	
Isopentane	
Isoprene	
Isopropanol	
Isopropyl Acetate	
Isopropyl Formate	
Isopropyl Mercaptan	
Isosafrole	
Isozaflutole	
Kerosene	

APPROVED CHEMICAL LIST FOR HAZARDOUS WASTE OPERATIONS

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Methyl Ethyl Morpholine

Methyl Formate

3-methylhexane

Methyl Hydrazine

Methyl Iodide

Methyl Isobutyl Ketone

Methyl Isocyanate

1-Methyl-2-Pyrrolidinone NMP

Methyl Mercaptan

Methylmercaptopropionaldehyde

Methyl Methacrylate

n-methyl morpholine

Methylnapthalene*

Methyl Parathion

4-methyl-2-pentanone

2-(3,5-bis(methylphenylethyl)-2

hydroxyphenyl

Methyl Propyl Ketone

n-methyl pyrillidone

Methyl Tert-Butyl Ether

tetramethylthiuram disulfide

n-nitroso-n-methylurethane

Methylal

Methylthiouracil

Methylcyclohexanol

Methylene-bis-ortho-chloroaniline

Methylene Chloride

Methylpyridine-2

Methyl vinyl bis

(N-methylacetamindes) silane

Mitomycin c

Molybdenum

Monochloroethylene

Monoethanolamine*

Monoisopropylamine

Monomethyl ether hydroquinone

Monopropylene Glycol

Morpholine

Muscimol

Naphtha

Naphthalene

1,4-naphthoquinone

Naphthylamine-beta (solid)

Nitric Acid

Nitric Oxide

Nickel*

Nitroaniline-p (solid)

Nitrobenzene*

Nitrodium-n-butylamine-N

Nitroglycerin (glyceryl)

Nitropropene-2

Nitrophenol*

Nitrophenol-4 (solid)

2,4-dinitrophenol

2-nitropropane

Nitrosopipindine-n

Nitrosuliethylamine-n

Nitro-o-toluidine-5

Nitroso-N-ethylurea-N

Nitroso-N-methylurea-N

N-nitrosodi-N-propylamine

m-Nitrotoluene

2,6-dinitrotoluene

Nonanal

Nonene

tert-nonyl mercaptan

Novalar resins

Octane

Octanol

n-Octyl Mercaptan*

Orthovanillin

Paraldehyde

Pelargonic Acid*

Pentachlorobenzene

Pentachloroethane

n-pentane

Pentanol

n-Pentanoic Acid*

Pentenitrile

3-pentenitrile

Perchloroethylene

Petroleum Distillates

Petroleum Distillates, Hydraulic Fluid

Petroleum Oil

Phenacetin

APPROVED CHEMICAL LIST FOR HAZARDOUS WASTE OPERATIONS

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Phenanthrene*	Propylene
Phenol	Propylene Dichloride
2,4 bis(alpha, alpha-dimethyl benzyl) phenol)	Propylene Glycol*
Phenothiazine	Propylene Glycol Acetate
4-bromophenyl phenyl ether	Propylene Glycol Methyl Ether
Phenyl mercaptan	Propylene Glycol Monoethyl Ether
Phosgene*	Propylene Glycol Monoethyl Ether Acetate
Phosphine*	Propyleneimine, inhibited
Phosphorus Pentasulfide	n-Propylmercaptan*
Phthalic anhydride	Propxur
Pinene-alpha	Pyridine*
Pinene-beta	Pyridine, 4-amino-
Piperylene	n-nitrosopyrrolidine
Poast herbicide	n-vinyl-2-pyrrolidinone
Polyester Glycol	Quaternarium Salts
Polyethylbenzene	Quintozene (solid)
Polyethylene	Reactive Sulfides
Polyethylene glycol dimethyl ether	Red Oil
Polyisobutyleneamine	Reserpine
Polyoxyalkyleneamine	Resorcinol
Polypropylene*	Rhodium*
Polystyrene	
Potassium Acetate	Safrole
Potassium Carbonate	Sassafras Oil
Process Oil	Selenium*
Promamide	Soap
Propane	Sodium Hydroxide*
2-amino-1,3-propanediol	Sodium Hypochlorite
2-amino-2-ethyl-1,3-propanediol	Sodium Methoxide
2-amino-2-methyl-1,3-propanediol	Sodium Methylmercaptide
Propane Sultone	Sodium Nitrate
Propanil	Sodium Sulfate*
Propanol	Sodium Sulfide
2-amino-2-methyl-propanol	Sodium Thiosulfate*
Propargyl Alcohol*	Sosafrole-1
Propionaldehyde*	Succinic acid
Propionic Acid	Succionitrile
Propionitrile	Sulfolane
Propionitrile, 3-chloro	Sulfur*
Propyl Acetate	Styrene
Propylamine	Sulfate Turpentine
Propyl Heptenal	Sulfolane
n-nitrosodi-n-propylamine	

APPROVED CHEMICAL LIST FOR HAZARDOUS WASTE OPERATIONS

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Sulfurized isobutylene

Taxol

Terbufos

Terphenyl

Tert Amyl Alcohol

Tert Butyl Alcohol

Di-tert nonyl polysulfide (TNPS)

Tertiary amine

Tetrachloroethane

Tetrachloroethylene

Tetraethylene Glycol

Tetrahydrofuran

Tetrahydrothiophene

Thiamethoxam

Thioacetamide (solid)

Thiofanox

1-acetyl-2-thiourea

Thiourea (2-chlorophenyl)-

TDI Polymers*

Thiosemicarbazide (solid)

Titanium tetrachloride

Toluene

Toluene Diamine*

o-toluenediamine

2,4-toluene diisocyanate

2,6-toluene diisocyanate

o-toluic acid

Toluidine

Toluidine hydrochloride-o

4-chloro-o-toluidine hydrochloride

Toxaphene*

Triallyl Amine*

Tributylamine

Tributyl phosphate

1,2,4-Trichlorobenzene

1,1,1-Trichloroethane

1,1,2-Trichloroethane

Trichloroethene

Trichloroethylene

Trichlorofluoromethane

Tridecane

Triethanolamine*

Triethylamine*

Triethylene Glycol

Trifluralin

Trimellitic Anhydride

Trimethylbenzene

Tripolyamine

Tri-n-propylamine*

2,4,6-Trinitrophenol*

Trypan blue

Undecane

Uracil Mustard

n-Valeraldehyde

4-keto-1-valeric acid

Vanillin

Vinyl Acetate

Vinyl Acetate Polymer

Vinyl Chloride

4-Vinyl cyclohexene-1*

Vinyl Methyl Ether

Vinylidene

Vinylidene Chloride

Vinyltrimethoxysilane

Warfarin*

p-Xylene

Xylene

Xylidine (p-dimethylaminoazobenzene)

* These compounds are subject to the emission rate limits of the July 2004 dispersion modeling report.

Dated: February 10, 2012

EMISSION SOURCES – MAXIMUM ALLOWABLE EMISSION RATES

Permit Number 4802/PSDTX1260

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
104	Regeneration Unit No. 2 Stack (8)	Cl ₂	5.70	25.00
		CO	0.84	0.18
		H ₂ SO ₄ (10)	6.06	22.67
		HCl	0.28	1.23
		NO _x	37.20	162.90
		PM	4.01	12.47
		PM ₁₀	4.01	12.47
		PM _{2.5}	4.01	12.47
		SO ₂	1250.00	5475.00
		VOC	0.01	0.01
104	Regeneration Unit No. 2 Stack (9)	Cl ₂	5.70	25.00
		CO	0.01	0.05
		H ₂ SO ₄ (10)	7.19	20.99
		HCl	0.16	0.70
		NO _x	37.20	61.95
		PM	4.01	12.47
		PM ₁₀	4.01	12.47
		PM _{2.5}	4.01	12.47
		SO ₂	143.75	377.78
		VOC	0.01	0.01
120	Vapor Combustor Standby Operation for Backup	CO	1.51	3.33
		NO _x	1.80	3.96
		PM ₁₀	0.14	0.30
		SO ₂	0.01	0.02
		VOC	0.10	0.22
120	Vapor Combustor (6) (Startup, Shutdown, and Maintenance 1,314 hours per rolling 12-months)	Cl ₂	0.14	0.09
		CO	0.40	0.27
		HCl	0.06	0.04
		NO _x	0.48	0.32
		PM ₁₀	0.04	0.02
		SO ₂	0.01	0.01
		VOC	22.22	3.41
128	Regenerator No. 2 Preheater (1,000 hours per rolling 12-months)	CO	2.07	1.03
		NO _x	2.46	1.23

Emission Sources – Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
		PM ₁₀	0.19	0.10
		SO ₂	0.02	0.01
		VOC	0.14	0.07
170	Vapor Combustor 2 Normal Operation	CO	4.28	0.30
		NO _x	2.15	0.15
		SO ₂	0.01	0.01
		VOC	0.08	0.01
170	Vapor Combustor 2 (6) (Furnace Startup, Shutdown, and Maintenance 1,314 hours per rolling 12-months)	Cl ₂	0.40	0.03
		CO	15.30	4.85
		HCl	2.07	0.13
		NO _x	1.78	0.57
		SO ₂	2.02	0.13
		VOC	12.90	0.86
170	Vapor Combustor 2 (6) (Storage Tanks 48, 49, 53 and 56 Planned Inspection Purge Control Option One)	CO	10.81	1.48
		NO _x	1.26	0.17
		SO ₂	0.02	0.01
		VOC	0.05	0.01
CATSCNR2	Catalyst Screening for Regeneration Unit No. 2 Converter (6)	PM	0.01	0.01
		PM ₁₀	0.01	0.01
		PM _{2.5}	0.01	0.01
MSS-HAZTK1	Hazardous Waste Tanks (F2, F3) and T554, Planned MSS Purge (6)	VOC	0.02	0.01
MSS-HAZTK2	Hazardous Waste Tanks (B1, B2, H1 and H2) Planned MSS Purge (6)	VOC	0.01	0.01
TKINSPMSS1	Tank 78 Planned Inspection Purge (6)	CO	3.04	0.75
		C ₂ H ₄	0.01	0.01
		NO _x	1.12	0.35
		SO ₂	0.08	0.09
		VOC (7)	0.05	0.06
TKINSPMSS2	Tanks 48, 49, 53 and 56 Planned Inspection Purge (6)	CO	3.04	0.40
		C ₂ H ₄	0.01	0.01
		NO _x	1.12	0.19
		SO ₂	0.08	0.01
		VOC (7)	0.05	0.01
FE2	Process Fugitives (5)	SO ₂	0.05	0.20
FE3	Process Fugitives (5)	SO ₂	0.01	0.03
FE-12	Fugitives from HW Equipment (5)	VOC	0.04	0.19

Emission Sources – Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
FE-13	Fugitives from HW Equipment (5)	VOC	0.02	0.10
FE-14	Fugitives from HW Equipment (5)	VOC	0.01	0.01
FUG-SA1	Spent Acid Process Fugitives (5)	H ₂ SO ₄	0.41	1.79
		SO ₂	0.12	0.37
		VOC	0.09	0.35
FUG-SA2	Spent Acid Process Fugitives (5)	H ₂ SO ₄	0.07	0.31
		SO ₂	0.03	0.08
		VOC	0.02	0.07
FUG-SA3	Spent Acid Process Fugitives (5)	H ₂ SO ₄	0.03	0.11
		SO ₂	0.06	0.18
		VOC	0.03	0.08
FUG-SA4	Spent Acid Process Fugitives (5)	H ₂ SO ₄	0.30	1.34
		SO ₂	0.13	0.38
		VOC	0.08	0.30

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3)
 - C₂H₄ - ethylene
 - CO - carbon monoxide
 - Cl₂ - chlorine
 - H₂SO₄ - sulfuric acid
 - HCl - hydrogen chloride
 - NO_x - total oxides of nitrogen
 - PM - particulate matter greater than 10 microns in diameter
 - PM₁₀ - particulate matter (PM) equal to or less than 10 microns in diameter.
 - PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter
 - SO₂ - sulfur dioxide
 - VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
- (4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
- (6) Planned startup, shutdown, and maintenance emissions
- (7) Ethylene emissions are not included in the VOC emission total.
- (8) Pre emission control
- (9) Post emission control effective on and after April 1, 2014
- (10) PSDTX1260 pollutant

Emission Sources – Maximum Allowable Emission Rates

Emission rates are based on and the facilities are limited by the following maximum operating schedule:

Hrs/day 24 Days/week 7 Weeks/year 52

Date: February 10, 2012

CHAPTER 2

STACK SAMPLING FACILITIES

GENERAL

Most sampling for representative results requires minimum sampling facilities for which the TCEQ has established the guidelines presented in this chapter. Stack sampling operations utilize a system of equipment to traverse a cross-section of the stack or duct through ports located such that a representative sample can be obtained. Normally, a monorail structure is erected so the cross-section of the stack may be traversed on two axes for circular stacks and on a matrix layout for rectangular or other shaped stacks.

These guidelines cannot anticipate all situations, and special cases will occur. Non-standard or alternate installations are therefore evaluated on an individual basis, and in such instances detailed plans should be sent to the local TCEQ Regional Office sufficiently in advance for review and approval before the construction of stack sampling facilities is initiated.

Various rules and regulations require that "safe and easy access" be provided for sampling. Facilities deemed insufficient by a TCEQ observer whether due to unsafe, crowded, or other conditions may preclude the observation of the sample and, in turn, the acceptance of the results.

The following guidelines constitute minimum requirements for safe and accessible stack sampling facilities. No attempt has been made to incorporate official safety rules, but all such applicable regulations must be followed.

PHYSICAL FEATURES

Before consideration is given to the installation of sampling ports and platforms, certain dimensions and other features of the stack and stack gas must be verified in order that a representative sample is possible.

- Stack diameter must be at least four inches.
- Stack gas velocity head must be at least 0.05 inches of water.
- The stack must have at least 2-1/2 diameters of uniform undisturbed cross-section.

SAMPLING PORTS

Port Location

The optimum location of sampling ports is at least eight stack diameters downstream of any bends, inlets, constrictions, abatement equipment, straightening vanes, or other flow disturbance; and at least two stack diameters upstream of the stack exit or other flow disturbance. Hydraulic diameter is used for non-circular stacks and is defined later in this chapter. This location permits a sample traverse to be taken using a minimum of twelve sampling points. A greater number of sampling points is necessary on stacks which fail to meet this location criteria. For a valid sample traverse to be obtained, however, sampling ports must be located at least two stack diameters downstream and at least one-half stack diameter upstream from any disturbance. If a

2-1/2 diameter length of uniform undisturbed stack cross-section is not available, stack modification must be made or an alternate sampling location must be chosen which will satisfy this criteria.

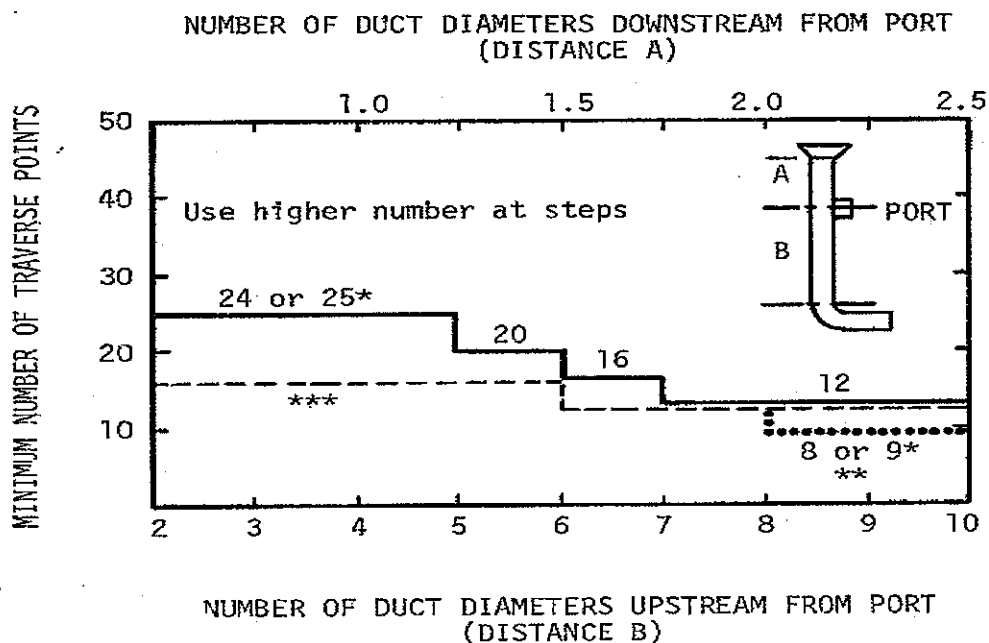
To minimize the increase in the number of sampling points required on stacks with undisturbed cross-section less than 10 but greater than 2-1/2 stack diameters in length, the sampling ports should be located such that the distance from the ports to the nearest upstream disturbance is four times the distance from the ports to the nearest downstream disturbance (see Figure 2-1 for minimum number of sampling points required). The 2-1/2 diameter criteria must be met; while the 4:1 distance ratio is a recommendation.

Port Size

Ports are minimum three-inch ID standard industrial flanged pipe with six-inch bolt circle diameter and closed by a removable blind flange. Larger port sizes are necessary on large diameter, double-walled stacks which necessitate longer ports, and six-inch ports are necessary for proportional PM-10 sampling. These ports should also be standard industrial flanged pipe. Ports no smaller than four inches inside diameter must be provided on stacks greater than ten feet in diameter.

Port Installation

Ports shall be installed flush with the interior stack wall and shall extend outward from the exterior stack wall no less than three inches nor more than eight inches unless additional length is required for gate valves. Gate valves should be installed only when extreme stack conditions and/or the presence of hazardous materials require such devices for the safety of personnel. Ports should be installed no less than five feet nor more than six feet above the floor of the platform and the clearance zone described later in this chapter must be maintained.



- *Higher number is for rectangular stacks or ducts.
- **Dotted line is for stack diameter of one through two feet (particulate and velocity traverses).
- ***Dashed line is for velocity traverses only (gaseous sampling).

Figure 2-1
Minimum Number of Traverse Points

Number and Location of Ports on Circular Stacks

A minimum of two ports shall be installed on diameters 90° apart if the stack diameter plus one port length (stack inside wall to end of port extension) is less than ten feet. Four ports shall be installed on diameters 90° apart if the stack diameter plus one port length is equal to or greater than ten feet. One traverse should be located in the plane of any bend or other disturbance that may have inertial effects on particles in the flow stream.

Number and Location of Ports on Non-Circular Stacks

The same upstream and downstream distance requirements discussed previously apply to non-circular stacks. The hydraulic diameter (four times the area divided by the perimeter) is used in place of the circular diameter. This becomes $(2AB)/(A+B)$ for a rectangular stack, where A and B are the cross-sectional dimensions of the stack. The streamwise location of the sampling ports is determined in the same manner as for circular stacks using the hydraulic diameter. The hydraulic diameter is used only for determining the location of sampling ports and the required number of sampling points. Hydraulic diameter is not used in data reduction.

The cross-stream location of the sampling ports is dependent upon the total number of sampling

points required. Figure 2-1 is used to determine the required minimum number of sampling points by reading the curve corresponding to the number of upstream hydraulic diameters (B) and downstream hydraulic diameters (A) and selecting the higher number.

The stack cross-section of square or rectangular stacks is divided into a matrix (i, j) of equal area rectangles such that $i = j$ or $i = j \pm 1$ and $i + j$ is equal to or greater than the total number of sampling points required. The number of sampling ports required is either i or j located along one side of the stack such that the centerline of each port is colinear with the centroid of each row of sampling points.

Stacks with cross-sections which are not circular or rectangular must be equipped with an adequate arrangement of sampling ports so that the stack cross-section may be divided into a sufficient number of area increments for a representative sample. If equal area increments are not possible, time weighting of the sample at the various sampling points may be necessary. Detailed plans of such installations should receive advance approval by the TCEQ.

MONORAIL SUPPORT STRUCTURE

The installation of a permanent monorail support structure is recommended to reduce set-up time and to eliminate the load-bearing requirements for the sampling ports. Figure 2-2 shows a drawing of the monorail support structure including the relative position of the bracket to the sampling port. This bracket is intended to be compatible with several types of sampling equipment. The loading requirements for ports or the monorail support structure are shown below.

Port or Monorail Support Loading

The port or monorail support installation shall be capable of supporting the following loads:

- Vertical load of 200 pounds
- Horizontal load of 200 pounds
- Radial load of 1000 pounds (along stack diameter)

WORK PLATFORM

A work platform shall be provided around the stack circumference between the sampling ports and extending at least three feet beyond each port. If four ports are required, the work platform shall extend around the entire circumference of the stack. The minimum platform width shall be at least three feet measured radially with stack diameter. The work platform must be capable of supporting at least 2000 pounds.

Safe and easy access to the work platform shall be provided via ladder, stairway, or other suitable means. Safe guardrails shall be provided around the platform. No open ladder well, stairwell, or other such opening shall be located within three feet of any sampling port. Ladder wells shall be covered at the platform and any opening to the platform shall be equipped with a safety bar or chain at the opening.

A temporary work platform for sampling operations is acceptable if proper safety and accessibility is provided. All other requirements detailed in this chapter such as for monorails,

ports, loading, clearance, and power must be met by the temporary facilities.

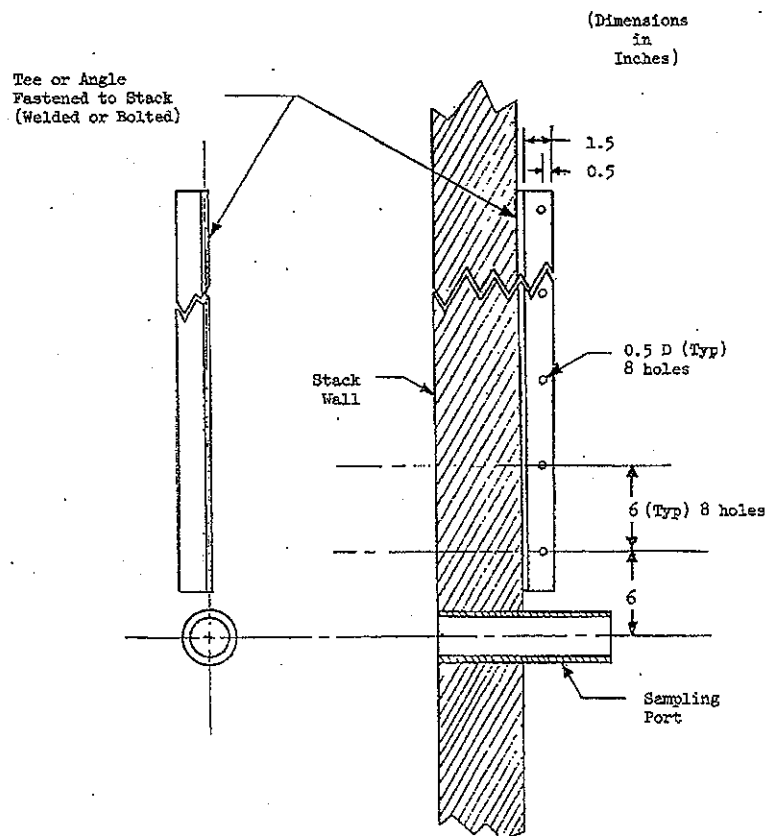


Figure 2-2 Monorail Support

CLEARANCE ZONE

A three-dimensional obstruction-free clearance zone shall be provided around each sampling port. The zone shall extend one foot above the port, two feet below the port, and two feet to either side of the port. The zone shall extend outward from the exterior wall of the stack at least one stack diameter (or stack radius if four ports are provided), plus one port length (inside wall to end of port extension) plus three feet. Although this clearance zone is generally adequate for most sampling efforts, sampling contractors may have other clearance needs. A general clearance zone is illustrated in Figure 2-3.

POWER SUPPLY

Power requirements may vary from site to site and the complexity and frequency of testing requirements. For complex test efforts the test firm and source owner/operator should verify adequate power is available. For normal test efforts electrical power outlets shall be provided as follows:

Platform Power

At least one 115-volt, 15-amp, single phase, 60 hertz alternating current circuit with a grounded two-receptacle weather-proof outlet. Receptacles shall accept standard three-prong grounded household-type plugs or suitable adapters shall be provided.

Stack Base Power

Two 115-volt, 15-amp, single phase 60 hertz alternating current circuits with grounded two-receptacle weather-proof outlets. Receptacles shall accept standard three-prong grounded household-type plugs or suitable adapters shall be provided.

VEHICLE ACCESS AND PARKING

Vehicle access and parking space should be provided near the base of the stack for various communications and equipment transport lines to be strung to the stack platform.

GASEOUS SAMPLING - CONCENTRATION ONLY

Standard sampling ports and platforms are normally necessary for gaseous sampling because a velocity traverse is needed for flow rate determination in most cases. In sampling situations for which only pollutant concentration is needed or for which an accurate flow rate is available by other approved means, less elaborate sampling facilities may be acceptable. All facilities must, however, meet strength and safety requirements.

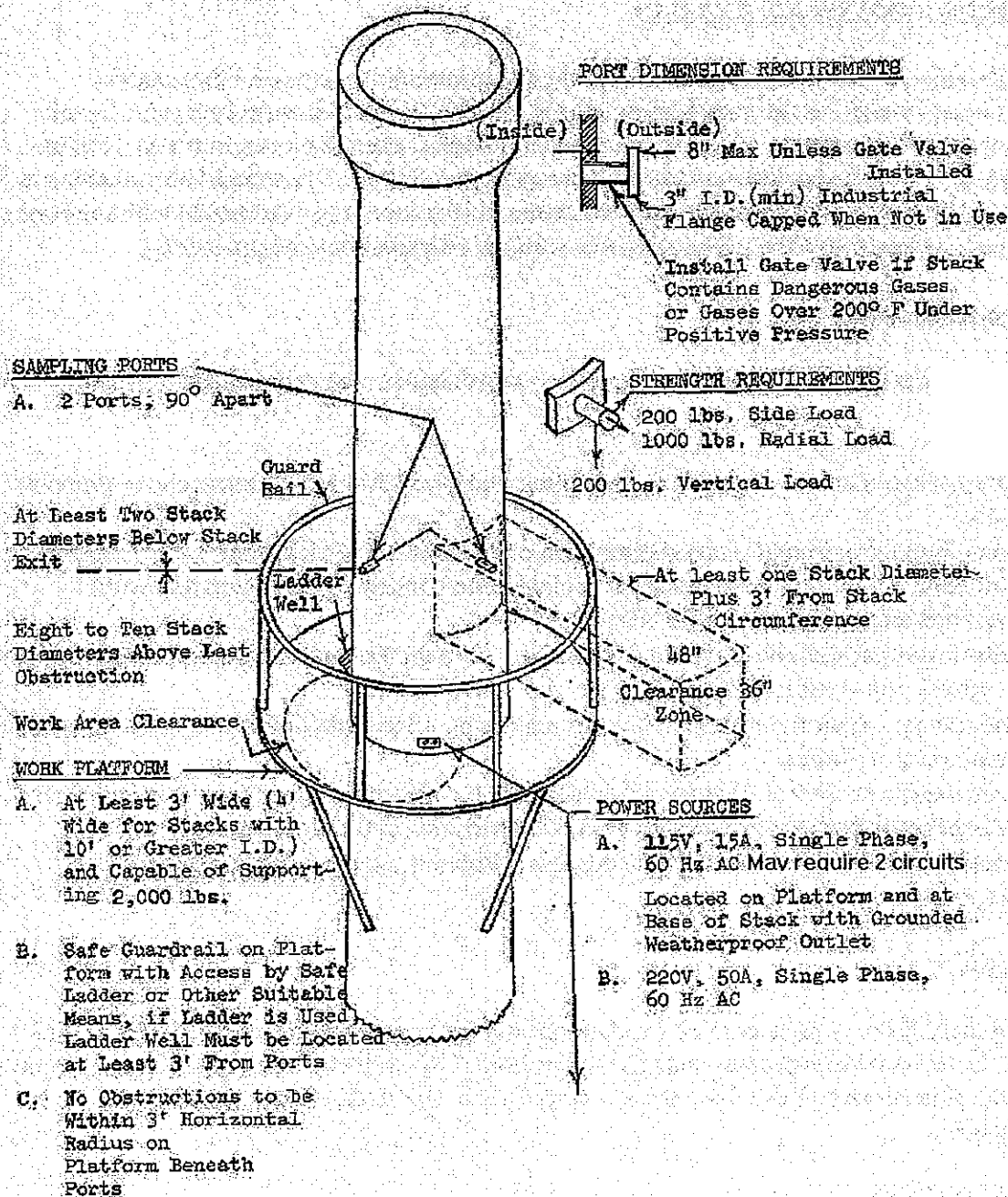


Figure 2-3 Stack Facilities

Gaseous sampling facilities for concentration only shall be sufficient for collection of a sample of stack gas according to standard gaseous sampling procedures. Adequate minimum facilities such as a one inch nipple shall be installed in the stack at a location where sufficient turbulence exists (no stratification) to insure a representative sample. Proper clearance must be provided for sampling operations or a permanent probe and sample line can be installed at the port location and extended to a more accessible sampling location. The probe and sample line must be installed so that leak checks can be made.

PERMANENT MONORAIL SYSTEMS

Source operators are encouraged to install permanent monorail systems on large stacks. Monorails must extend the full radial length of the clearance zone described previously, and must be capable of supporting a 200 pound load anywhere along the monorail track. Rollers must be properly lubricated and maintained in working condition. The sample box attachment hooks should be six inches above the port centerline. If the monorail is installed with the hooks more than six inches above the port centerline, suitable adapters must be provided.

Miscellaneous Requirements

In addition to the specific requirements detailed in this chapter, other miscellaneous requirements are as follows:

- Power hoists shall be provided for sampling platforms 200 feet or more above ground level.
- Non-circular horizontal ducts should have provisions for vertical sampling. Circular horizontal ducts should have one vertical and one horizontal port. Suitable work platforms are necessary in both cases.
- Heat insulation shall be installed as necessary on high temperature stacks for safety in the vicinity of the work platform.
- The source operator is responsible for maintaining all sampling facilities in safe, useable condition at all times.
- As mentioned earlier, one traverse should be located in the plane of any bend or other disturbance that may have inertial effects on particles in the flow stream.
- Stacks may taper by as much as 15 degrees without the taper being considered a disturbance.

EXCESS AIR

Additional facilities may be necessary for determining the composition and flow rates of feed stock and fuel on certain processes such as incinerators. This information, obtained at the time of sampling, is necessary to calculate the amount of air in the stack effluent in excess of stoichiometric.

CYCLONIC FLOW

Cyclonic or swirling flow may be encountered in a stack or duct due to certain circumstances such as cyclone collectors or tangential duct entry. Corrective measures such as straightening vanes may be necessary to alleviate the cyclonic condition.

The existence of cyclonic flow may be determined as described in Chapter 5. A method for sampling cyclonic flow is described in Appendix H, but advance approval should be obtained concerning its applicability for determining compliance status.

CHAPTER 14

CONTENTS OF AIR EMISSION TEST REPORTS

GENERAL

This chapter outlines the requirements for the contents of air emission test reports. Special sampling situations may arise that do not fit these categories; however, this chapter has been broadly designed to serve as a guide to the standardization and quality assurance practices that must be included for a report to be considered complete. These items will be checked upon review. The four most common deficiencies of test reports are: insufficient documentation of process conditions, insufficient documentation of test activities, inadequate calibration of test equipment, and the lack of approval for alternate methods or method deviations. It is required that all testing activities incorporate good laboratory practices. Also the procedures used for testing and reporting of results shall be those which are commonly accepted in the field of air pollution control per 30 TAC Chapter 101.14. All emission related data generated at the site must be submitted, once the TCEQ has been notified a compliance test is scheduled. Omission of pertinent information will be grounds for rejection of a report, which could subject the facility to non-compliance and possible enforcement action. In addition, the Texas Clean Air Act, Criminal Offenses, §382.091(a)(2), addresses intentionally or knowingly omitting material information, making false statements, concealing, and/or altering any notice, report or other document required by chapter, rule or permit.

Reports reviews are conducted by the TCEQ to determine acceptability of the report based on the following general criteria:

- a. Is the air emissions test report in an acceptable and logical format?
- b. Is the air emissions test report complete?
- c. Have the Source's Subpart/Permit/Standard Exemption testing requirements been fulfilled?
- d. How valid is the testing event's raw test data?
- e. Were correct equations and terms used in the report's calculations?

A TCEQ conducted report review is the ultimate basis upon which an Air Emissions Test Report is officially accepted or rejected by the Agency (TCEQ). The acceptability of a report is easier to determine if contents are complete and presented in a logical, organized manner, as illustrated in this chapter. Use of the TCEQ format for presentation of field data and calibration is encouraged to expedite report evaluation. At least two copies of each report shall be sent to the TCEQ, one copy to the appropriate TCEQ regional office, and the second copy to the Austin Office, Engineering Services Team. It is recommended that the following list be used as a checklist for the report to insure it is complete.

STACK SAMPLING

Stack test reports shall contain the following minimum information:

Table of Contents: Or an equivalent means of locating sections of the report, including additional volumes or appendices which may be required.

Every page of the report will be numbered.

- Introduction :** Background information pertinent to the test and testing requirements (title page may be sufficient)
- Name and physical location of source sampled and date(s) of sampling.
 - Identification of the process and name and number of the unit sampled using TCEQ Account Numbers, TCEQ Permit Numbers, and Emission Point Numbers
 - List of applicable testing requirements with brief explanation:
 - TCEQ Regulation numbers; TCEQ Permit numbers;
 - TCEQ Permit exemption requests, U.S. Environmental Protection Agency (EPA) New Source Performance Standards (NSPS)/National Emissions Standards for Hazardous Air Pollutants (NESHAPS) Subparts; Hazardous Organic NESHAPS (HON)
 - other (i.e. NOV resolution, increased production rates, etc...).
 - List of pollutants sampled.
 - State whether this is the initial test, quarterly, or otherwise
 - A detailed explanation of any tests which were not completed for any reason.

Summary: The portion of the air emissions test report that states the final results of the testing event and compares the results to the requirements, provisions and allowances of the applicable governing regulations and standards.

The Test Report summary shall compare all pollutant mass emission rates determined during the air emissions testing event with all applicable standards, including: NSPS, NESHAP, HON, TCEQ general and/or special provisions/conditions of the source's Permit, Permit Application Representations, Exemption Demonstration Requirements, etc.. Additionally, it should address any case where relevant air emissions testing has been conducted, or where special source conditions have brought about relevant test conditions, such as increased production rates.

The averages of each of the air pollutant concentrations required to be measured by the source's permit, or applicable Federal Subpart, or any other environmental regulatory agency with jurisdiction.

The averages of pertinent support data measured during the testing event, in time units which are appropriate for use in the determination of the mass emission rate(s) of the air pollutants required to be tested for, (by the source's operating permit or the applicable Federal Subpart).

- Particulate emissions rates including and excluding the impinger catch portion of the sample. The impinger portion of the sample may be excluded only in certain cases.

- Percent isokinetic for each isokinetic sample.
- Schedule of intermittent periods during sampling and the normal schedule of such events (i.e. Soot blowing, CEMS blowback, process downtime, batch process, etc.).
- Operating level of the process during each sample or sample run plus the normal (usual), design maximum and maximum achievable operating levels.
- Statement of operating condition of all abatement equipment during sampling including any cleaning cycles associated with the abatement equipment (i.e, absorber regeneration, baghouse bag cleaning cycles, ESP rapping, etc.).

Procedures:

Description of equipment and procedures used during sampling and analysis

- If equipment, procedures, and analysis methods were those described in the applicable sections of the TCEQ Sampling Procedures Manual, the Federal Register, and the Test Plan, a statement to that effect should be included along with a list of specific methods, procedures, and test equipment; schematic of instrumental analyzer sampling system, including all pumps, valves, mass flow controls, sample conditioning systems, heated lines, manifolds and atmospheric vents as configured during the test; any Reference Method deviation(s) approved by the TCEQ, including the date approved, and name & title of the TCEQ representative who approved the deviation(s).
- If any equipment, procedures, and analysis methods were consistent with TCEQ Sampling Procedures Manual, the Federal Register, and the Test Plan, provide additional information for those efforts including a detailed description of such methods, procedures, and equipment used; written approval for any deviations from standard procedures including: the name and description of all special apparatus and alternative testing methods used during test; copy of the method and publication references; written documentation of alternate test method approval.

Appendices:

The portions of the air emissions test report that include various categories of supplementary and support information which is included to enhance the validity of the practices and procedures conducted prior, during and subsequent to the air emissions testing event.

- Schematic drawing of stack (elevation and plan views) showing all dimensions, sampling port locations, inlets, outlets, and nearest upstream and downstream flow disturbances with sampling point

locations shown on plan view. Pictures of emission points may be substituted for drawings however, measurements of the interior dimensions of the emission point are required.

- Copies of all raw data taken during sampling. All handwritten data shall be recorded exclusively in indelible ink by all test and plant personnel, during the air emissions testing event. All data generated during the test by any instrumentation such as strip charts, integrator printouts, data acquisition system printouts shall be completely reproduced legibly, and included. The duration of all test runs, calibrations, and other significant events shall be clearly indicated

Process Data: The averages of all process raw data recorded during the testing event, in time units which are appropriate for use in the determination of the mass emission rate(s) of the air pollutants required by the source's operating permit or the applicable Federal Subpart.

The averages of all process or production parameters recorded, calculated or determined during the air emissions testing event, in time units which are appropriate for use in the determination of the mass emission rate(s) of the air pollutants required by the source's operating permit or the applicable Federal Subpart.

All other information necessary, at the discretion of the TCEQ, prior or subsequent to the test, so long as it does not place an unreasonable burden, financially or logistically upon the consultant or owner/operator.

All measured pollutant emissions: both including & excluding the impinger catch portion of extracted samples.

The Air Emissions Test Report shall state the following process or production rates for the facility, or the production or process unit in which the emission source is in service:

- Logs of process parameters as may be necessary to document levels of operation. All printouts obtained from process, such as load etc., must be accompanied by a description which identifies the parameters and units used
- Designed Rate
- Permitted Rate (if applicable)
- Maximum Rate (if different from the designed rate)
- Production Rate(s) Demonstrated during the testing event(s)

- Production Rates(s) Demonstrated during the Immediately Previous air emissions testing event, if applicable. (recommended)

Calibrations:

Dated calibration records with dates and worksheets for all equipment used during sampling. The name and description of all primary air emissions testing equipment used during the air emissions testing event, including manufacturer, model number and serial numbers. If in question, the adequacy of the calibrations will be compared to the procedures in the current edition of the Quality Assurance Handbook for Air Pollution Measurement Systems

Lab data:

Laboratory analysis worksheets and results including tare weights, blank results, spiked samples, audit samples and recovery studies required by the test method must be included. Additional information sufficient for an independent evaluation of the procedure may be required for complex methods such as daily calibrations, date and time analysis were conducted, audit materials, and laboratory certifications.

A record of the chain of custody of the samples from sampling collecting through the final sample analysis.

Visible emission determination, opacity data sheets, observer certification, etc. if conducted.

Calculations:

- Example calculations of all applicable stack gas parameters, emission rates, and analytical results for the test including:
 - Emission rates;
 - Allowable emission rates (TCEQ, EPA);
 - Excess air in stack;
 - Cyclonic flow;
 - Percent isokinetic;
 - F factor;
 - Soot blowing;
 - Stack gas parameters (velocity, moisture content, ACFM, SCFM)
 - Intermediate steps during analysis (titrations, aliquots, blanks)
 - An example calculation shall be performed using actual data from one of the valid test runs.

Consultant:

- Personnel information
 - Name, address, and telephone number of company and name of company contact for additional information;
 - Name and affiliations of all personnel present during testing and their responsibilities during the test;
 - Name, address, and telephone number of testing organization;

Also required as part of the report submittal is pretest meeting documentation, if a pretest meeting was held. A copy of the TCEQ permit, if any, which applied to the unit(s) at the time of the testing to document the language and emission limits at the time of the testing. Written approval for any major modification to a Reference Method. Written approval for any method(s) which was used that is not published in an EPA document, along with a copy of the method(s) detailing minimum and maximum detection limits, interferences, etc.

For testing required under the provisions of TCEQ flexible permits, reports should contain a calculation of emissions to compare to the cap on the day of testing for all emissions sources under the cap. The Hourly Cap Compliance Demonstration Summary Table (HCCDST) should be used to report the data.



*Eco Services Enterprise
Houston Plant*

CERTIFIED MAIL: RETURN RECEIPT REQUESTED (7011 2000 0001 4575 4553)

January 27, 2012

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

RECEIVED
12 FEB -2 AM 11:08
AIR PERMITS SECTION
6PD-R

Subject: Rhodia Inc. (CN600125330)
Houston Plant (RN100220581)
Public Notice Verification Form
Air Permit No.: 4802 and PSDTX1260
Account No.: HG-0697-O

Dear Sir or Madame:

Please find the Public Notice Verification Form for the Rhodia Houston plant's above mentioned air permit amendment application.

If you have any questions or require additional information, please contact me at 713-924-1408.

Sincerely,

A handwritten signature in black ink, appearing to read "W. F. Dickerson".

W. F. Dickerson
Environmental Manager

attachments

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

cc: U.S. Environmental Protection Agency
Region 6
Attn: Air Permits Section (6PD-R)
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

TCEQ
Air Section Manager
Region 12
5425 Polk St. Suite H
Houston, TX 77023-1452

TCEQ
Office of Air
Air Permits Division, MC-163
Mr. Stephen Anderson, P.E.
P.O. Box 13087
Austin, TX 78711-3087

Mr. Bob Allen, Director,
Environmental Public Health Division
Harris County Public Health and Environmental Services
101 S Richey Street Suite G
Pasadena, TX 77506

Mr. Arturo Blanco
Bureau Chief of Air Quality Control,
Health and Human Services Department,
City of Houston
7411 Park Place Blvd., Room 108
Houston, TX 77087-4441

Texas General Land Office
Upland Leasing Team Leader
Professional Services
P.O. Box 12873
Austin, TX 78711-2873

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Public Notice Verification Form

Air Permit

Applicant Name: Rhodia Inc.

Site or Facility Name: Houston Plant

TCEQ Account Number (if applicable): HG-0697-O

Permit Number: 4802/PSDTX1260

Regulated Entity Number: RN100220581

Customer Number: CN600125330

The completed form must be sent to the TCEQ to the attention of the Office of the Chief Clerk **within 10 business days after the end of the designated comment period**. For more information regarding public notice refer to the instructions in the public notice package.

ALTERNATIVE LANGUAGE CHECKLIST

I have contacted the appropriate school district.

☒ Yes ☐ No

A bilingual education program is required by the Texas Education Code in the district.

☒ Yes ☐ No

School District: Houston ISD

Phone Number: _____

Person Contacted: _____

Date: _____

The name of the elementary school nearest to the proposed or existing facility is: J. R. Harris

The name of the middle school nearest to the proposed or existing facility is: Deady Middle School

Students who attend one of the schools above are eligible to be enrolled in a bilingual program provided by the district.

☒ Yes ☐ No

The following language(s) is/are utilized in the bilingual program: Spanish

If an applicable bilingual program exists, then applicants must publish a notice and/or post signs, as outlined in the *Instructions for Public Notice* and certify as applicable on this form.

ALTERNATIVE LANGUAGE VERIFICATION

The area addressed by this permit application is subject to alternative language public notice requirements.

☒ Yes ☐ No

The applicant has conducted a diligent search for a newspaper or publication of general circulation in both the municipality and county in which the facility is located (or proposed to be located).

☒ Yes ☐ No

No such newspaper or publication was found in any of the alternative language(s) in which notice is required.

☐ Yes ☒ No

The publishers of the newspapers listed below refused to publish the notice as requested and no other newspaper or publication in the same language and of general circulation was found in the municipality or county in which the facility is located (or proposed to be located).

☐ Yes ☐ No ☒ N/A

Newspaper: _____

Language: _____

Bilingual sign(s) required by the TCEQ were posted. (if applicable)

☒ Yes ☐ No

Original tear sheets of the newspaper alternative language notice(s) and the requested affidavits have been sent to the TCEQ.

☒ Yes ☐ No

Verified by (signature): [Signature]

Applicant: Rhodia Inc.

Title: Environmental Manager

Date: 1/27/2012



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Public Notice Verification Form
Air Permit

Print Form

Applicant Name: Rhodia Inc.

Site or Facility Name: Houston Plant

TCEQ Account Number (if applicable): HG-0697-O

Permit Number: 4802/PSDTX1260

Regulated Entity Number: RN100220581

Customer Number: CN600125330

The completed form must be sent to the TCEQ to the attention of the Office of the Chief Clerk **within 10 business days after the end of the designated comment period**. For more information regarding public notice refer to the instructions in the public notice package.

NEW SOURCE REVIEW PERMIT NOTICE VERIFICATION

Required signs (for 1st notice) were posted in accordance with the regulations and instructions of the TCEQ. ☐ Yes ☐ No

Original tear sheets of the newspaper notices and the requested affidavits have been furnished in accordance with the regulations and instructions of the TCEQ. ☐ Yes ☐ No

Notice of Receipt of Application and Intent to Obtain Permit (1st Notice):

☐ Yes ☐ No

A copy of the complete air quality application, and any revisions, were available for review and copying at the public place indicated below throughout the duration of the public comment period.

The public place indicated below provides public access to the internet.

☐ Yes ☐ No

Notice of Application and Preliminary Decision (2nd Notice, if applicable):

☒ Yes ☐ No

A copy of the complete air quality application, executive director's preliminary decision (which includes the draft permit), the preliminary determination summary, and air quality analysis (if applicable), and any revisions, are available for review and copying at the public place indicated below from the first day after newspaper publication.

A copy of the complete air quality application, executive director's preliminary decision (which includes the draft permit), the preliminary determination summary, and air quality analysis (if applicable), and any revisions, will remain in the designated public place until either:

☒ Yes ☐ No

(1) the TCEQ acts on the application; or

(2) the application is referred to the State Office of Administrative Hearings (SOAH) for hearing.

Name of Public Place: Houston Public Library - Melcher Neighborhood Library

Address of Public Place: 7200 Keller Street Houston, Texas 77012

Verified by (signature): *[Signature]*

Applicant: Rhodia Inc.

Title: Environmental Manager

Date: 1/27/2012

FEDERAL OPERATING PERMIT (TITLE V) NOTICE VERIFICATION

The required signs were posted in accordance with the regulations and instructions of the TCEQ. ☐ Yes ☐ No

Original tear sheets of the newspaper notices and the requested affidavits have been furnished in accordance with the regulations and instruction of the TCEQ. ☐ Yes ☐ No

A copy of the complete air quality application and draft permit, and any revisions, were available for review and copying at the public place indicated below throughout the duration of the public comment period. ☐ Yes ☐ No

Name of Public Place:

Address of Public Place:

Verified by (signature):

Applicant:

Title:

Date:

PRELIMINARY DETERMINATION SUMMARY

Rhodia, Inc.

Permit Numbers 4802 and PSDTX1260

I. APPLICANT

Rhodia, Inc.
8615 Manchester Street
Houston, TX 77012-2142

II. PROJECT LOCATION

The Rhodia site is located at 8615 Manchester Street, Houston, Harris County, Texas.

III. PROJECT DESCRIPTION

Rhodia proposes changes to the sulfuric acid (H_2SO_4) daily production to 1150 tons per day by installing new and replacement equipment, add catalyst to the acid converter and install a new caustic scrubber to reduce sulfur dioxide (SO_2) emissions downstream of the mist eliminator leading to an increase in H_2SO_4 mist emissions from Emission Point No. (EPN) 104. The proposed project emission increase of H_2SO_4 mist is greater than the seven tons per year (TPY) PSD major modification level for H_2SO_4 mist at a named major stationary source. Netting was triggered and the net contemporaneous H_2SO_4 mist emission increase is greater than seven TPY. This EPN receives H_2SO_4 mist contained in the waste gas downstream of the existing H_2SO_4 converters. No planned maintenance, startup and shutdown (MSS) activity and emissions will be authorized in this PSD permit for H_2SO_4 mist.

IV. EMISSIONS

The represented total potential to emit (PTE) emission from this site are 40 TPY of carbon monoxide, 94 TPY of H_2SO_4 mist, 215 TPY of nitrogen oxides, 13 TPY of particulate matter less than ten microns, 6280 TPY of SO_2 and 10 TPY of volatile organic compounds. The H_2SO_4 mist PTE is proposed to be 20.99 TPY from EPN 104. This represented H_2SO_4 mist emission increase of 20.99 TPY for this project requires a PSD netting exercise. Rhodia performed a contemporaneous netting exercise and found the H_2SO_4 mist contemporaneous increase is 10 TPY and this H_2SO_4 mist emission increase is subject to PSD review. The project increase (potential to emit minus baseline actual emissions) of the other criteria pollutants emitted are summarized in the table below of Section V, Federal Applicability. The emission changes of other criteria pollutants associated with amendment are less than the respective PSD significance level of that pollutant.

V. FEDERAL APPLICABILITY

Harris County is designated attainment for NO_x, PM_{2.5} and H₂SO₄ mist. The project H₂SO₄ mist PTE will be 20.99 TPY from EPN 104. For purposes of federal applicability review determination, the contemporaneous project increases (applicable to both new and existing facilities) were compared to the PSD H₂SO₄ mist major modification limit of seven TPY at a named major stationary source. The represented contemporaneous H₂SO₄ mist emission increase of 10.74 requires a PSD review after Rhodia completed the PSD contemporaneous netting exercise. The project PM_{2.5} PTE will be 12.47 TPY from EPN 104. For purposes of federal applicability review determination, the contemporaneous project increases (applicable to both new and existing facilities) were compared to the PSD PM_{2.5} major modification value of ten TPY at a named major stationary source. The netting demonstration showed a contemporaneous PM_{2.5} emission increase of 5.97 TPY. PSD review does not apply to this PM_{2.5} emission increase.

Harris County is designated severe ozone nonattainment. The project NO_x emission increase was evaluated as an ozone precursor. The actual to allowable NO_x emission comparison from EPN 104 found a project emission increase of 4.94 TPY which is below the five TPY netting trigger for ozone nonattainment review. The PSD NO_x netting threshold of forty TPY is not exceeded at a named major stationary source.

Pollutant	Project Increase (tpy) ¹	PSD Netting Trigger (tpy)	Netting Required Y/N	Net Emission Change (tpy) ²	Major Mod Trigger (tpy)	PSD Triggered Y/N
VOC ⁵	0.0	40	N	-	40	N
NO _x ³	4.94	40	N	-	40	N
SO ₂ ³	0.0	40	N	-	40	N
CO	0.0	100	N	-	100	N
PM ₁₀	12.47	15	N	-	15	N
PM _{2.5} ⁴	12.47	10	Y	5.97	10	N
H ₂ SO ₄	20.99	7	Y	10	7	Y

- ¹ Project Increases: Comparison of Baseline Actual to PTE (or Projected Actual) Increases only
- ² Net Emissions: Baseline Actual to PTE (or Projected Actual) for the project currently under review, Baseline Actual to PTE for all other increases & decreases within netting window.
- ³ PM_{2.5} precursor. Not used to trigger PM_{2.5} BACT or impacts analysis at this time.
- ⁴ Use PM₁₀ emissions only if PM_{2.5} emissions cannot be quantified or estimated. (PM_{2.5} Implementation Plan).
- ⁵ Harris County is designated severe ozone nonattainment and PSD review does not apply.

VI. CONTROL TECHNOLOGY REVIEW

A review of the US EPA RBLC for BACT of H_2SO_4 mist emissions from new or modified H_2SO_4 production units found it is 0.15 pounds H_2SO_4 mist per ton of produced H_2SO_4 on an hourly basis and 0.10 pounds H_2SO_4 mist per ton of produced H_2SO_4 on an annual basis.

The new caustic scrubber and other equipment will lead to increased H_2SO_4 production which leads to increased H_2SO_4 mist emissions from EPN 104. The technical review found installing a new mist eliminator is technically and economically viable as BACT for abating H_2SO_4 mist emissions. BACT for H_2SO_4 mist control is a mist eliminator controlling H_2SO_4 to 0.15 pound per ton of produced H_2SO_4 on an hourly basis. BACT for H_2SO_4 mist control is 0.10 pound of H_2SO_4 mist per ton of produced H_2SO_4 on an annual basis. The company will continue to use the existing equipment configuration for H_2SO_4 control. In addition, this technical review did not find evidence of any potential tail gas treatment that could be applied upstream and downstream of the new mist eliminator. The H_2SO_4 mist control level achieved by the mist eliminator meets BACT.

Recordkeeping and stack sampling requirements are shown by special conditions in the permit for H_2SO_4 mist emissions from EPN 104.

VII. AIR QUALITY ANALYSIS

A. DE MINIMIS ANALYSIS

No NAAQS de minimis exists for H_2SO_4 mist and only the state H_2SO_4 mist standards are applicable. The results are described in Section VII.C NAAQS Analysis

B. AIR QUALITY MONITORING

H_2SO_4 mist has no published ambient monitoring standard.

C. NATIONAL AMBIENT AIR QUALITY STANDARDS (NAAQS) ANALYSIS

No NAAQS significance levels are shown for H_2SO_4 mist; therefore, a comparison with state of Texas standards is shown. The predicted twenty-four (24) hour impact for site wide H_2SO_4 mist emissions are $13.5 \text{ } \Phi\text{g}/\text{m}^3$, which is less than the 30 TAC Chapter 112 value of $15 \text{ } \Phi\text{g}/\text{m}^3$ for the 24 hour averaging time. The predicted worst case one hour impact for site wide H_2SO_4 mist emissions are $43 \text{ } \Phi\text{g}/\text{m}^3$ which is less than the 30 TAC Chapter 112 limit of $50 \text{ } \Phi\text{g}/\text{m}^3$. The results are summarized below in units of $\text{ } \Phi\text{g}/\text{m}^3$:

Pollutant	Averaging Period	GLC,max ($\mu\text{g}/\text{m}^3$)	Modeling Deminimis ($\mu\text{g}/\text{m}^3$)	30 TAC 112 ($\mu\text{g}/\text{m}^3$)
H_2SO_4 mist	1 - hr.	43	5	50
	24-hr	13.5	1	15

D. INCREMENT ANALYSIS

H_2SO_4 mist has no published PSD increment standard.

E. ADDITIONAL IMPACTS ANALYSIS

The nearest Class I area, Caney Creek Wilderness Area is located greater than 475 kilometers from this existing site. This is an existing H_2SO_4 production unit and no significant growth in the population or significant change in environmental impacts is expected. No adverse impacts on soils, vegetation or visibility are anticipated.

F. AIR TOXICS REVIEW

No new and no additional speciated VOC compounds will be authorized as emissions from EPN 104.

VIII. CONCLUSION

The Texas Commission on Environmental Quality (TCEQ) analysis of the permit application indicates that this source will not endanger NAAQS and will meet BACT requirements. In addition, there will be no adverse effects on soils, vegetation or visibility. The distance to the nearest Class I area is sufficient to preclude any adverse impacts from this named major stationary source. Therefore, the TCEQ Executive Director proposes a preliminary determination of approval for Rhodia to increase annual H_2SO_4 production by installing a new caustic scrubber to abate H_2SO_4 mist at the existing production site located in Houston, Texas.

RECEIVED
12 JAN 10 PM 4: 46
AIR PERMITS SECTION
6PD-R



CERTIFIED MAIL: Return Receipt Requested (7011 2000 0001 4575 4409)

January 4, 2012

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team
P.O. Box 13087
Austin, TX 78711-3087

Re: Rhodia Inc. (CN600125330)
Houston Plant (RN100220581)
Air Permit No. 4802 and PSD-TX-1260
Account No.: HG-0697-O

Dear Notice Team:

The Houston plant of Rhodia Inc. has completed the public notice publication requirements for the above-referenced permit, and original newspaper clippings, original affidavits, and alternative language affidavits for publication are enclosed. The public notice was published on December 26, 2011 in the Houston Chronicle and in La Voz de Houston.

If you have any questions on the amendment request, please do not hesitate to contact me at (713) 924-1484.

Sincerely,



W. F. Dickerson
Environmental Manager

Attachments

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

cc: U.S. Environmental Protection Agency
Region 6
Attn: Air Permits Section (6PD-R)
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

TCEQ
Office of Air
Air Permits Division, MC-163
Mr. Stephen Anderson, P.E.
P. O. Box 13087
Austin, TX 78711-3087

TCEQ
Region 12
Air Section Manager
5425 Polk St. Ste. H
Houston, TX 77023-1452

Texas General Land Office
Upland Leasing Team Leader
Professional Services
P.O. Box 12873
Austin, TX 78711-2873

Mr. Bob Allen
Director Pollution Control Department
Harris County Public Health and Environmental Services
101 S. Richey St. Ste. G
Pasadena, TX 77506

Mr. Arturo Blanco
Bureau Chief of Air Quality Control, Health and Human Services Department,
City of Houston
7411 Park Place Blvd.
Houston, TX 77087-4441

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Rhodia Inc.

Permit No.: 4802 and PSDTX1260

AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS

§

COUNTY OF HARRIS

§

Before me, the undersigned authority, on this day personally appeared

EDWARD SILVA

(name of newspaper representative)

, who being by me duly sworn,

deposes and says that (s)he is the AIR CLERK

(title of newspaper representative)

of the HOUSTON CHRONICLE; that said newspaper is generally circulated

(name of newspaper)

in HOUSTON, HARRIS COUNTY, Texas;

(in the municipality or nearest municipality to the location of the facility or the proposed facility)

that the attached notice was published in said newspaper on the following date(s): 12-22-11

AD# 25170889 ACCT# 002695221

Edward Silva

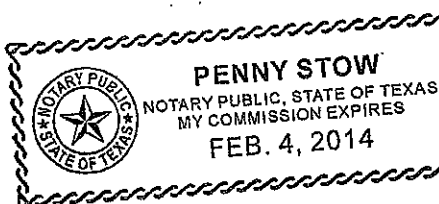
(newspaper representative's signature)

Subscribed and sworn to before me this the 26 day of DECEMBER, 20 11

to certify which witness my hand and seal of office.

[Signature]
Notary Public in and for the State of Texas

(Seal)



PENNY STOW
Print or Type Name of Notary Public

2/4/14
My Commission Expires

**NOTICE OF APPLICATION AND
PRELIMINARY DECISION FOR AN AIR
QUALITY PERMIT**

**AIR QUALITY PERMIT NUMBERS: 4802 AND
PSDTX1260**

APPLICATION AND PRELIMINARY DECISION. Rhodia Inc., 8615 Manchester St., Houston, Texas 77012-2142, has applied to the Texas Commission on Environmental Quality (TCEQ) for amendment of Air Quality Permit 4802 and issuance of Prevention of Significant Deterioration (PSD) Air Quality Permit PSDTX1260, which would authorize construction of a caustic scrubber at the Regeneration Unit No. 2 at 8615 Manchester St., Houston, Harris County, Texas 77012. This application was submitted to the TCEQ on June 6, 2011. The existing facility will emit the following air contaminants in a significant amount: sulfuric acid mist. In addition, the facility will emit the following air contaminants: organic compounds, nitrogen oxides, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less, sulfur dioxide, carbon monoxide, sulfuric acid, hydrogen chloride and chlorine.

The executive director has determined that the emissions of air contaminants from the proposed facility which are subject to PSD review will not violate any state or federal air quality regulations and will not have any significant adverse impact on soils, vegetation, or visibility. All air contaminants have been evaluated, and "best available control technology" will be used for the control of these contaminants.

The executive director has completed the technical review of the application and prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The permit application, executive director's preliminary decision, draft permit, and the executive director's preliminary determination summary and executive director's air quality analysis, will be available for viewing and copying at the TCEQ central office, the TCEQ Houston regional office, and at the Melcher Neighborhood Library, 7200 Keller Street, Houston, Harris County, Texas, beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review at the TCEQ Houston Regional Office, 5425 Polk St., Ste. H, Houston, Texas.

INFORMATION AVAILABLE ONLINE. These documents are accessible through the Commission's Web site at www.tceq.texas.gov/goto/cid; the executive director's preliminary decision which includes the draft permit, the executive director's preliminary determination summary, the air quality analysis, and, once available, the executive director's response to comments and the final decision on this application. Access the Commissioners' Integrated Database (CID) using the above link and enter the permit number for this application. The public location mentioned above provides public access to the internet. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <http://prs.tceq.texas.gov/crintro/index.cfm?fuseaction=detail.addnldDetail&addnld=580791102002159&getall=no#>.

PUBLIC COMMENT/PUBLIC MEETING. You may submit public comments or request a public meeting about this application. The purpose of a public meeting is to provide the opportunity to submit comment or to ask questions about the application. The TCEQ will hold a public meeting if the executive director determines that there is a significant degree of public interest in the application, if requested by an interested person, or if requested by a local legislator. A public meeting is not a contested case hearing. You may submit additional written public comments within 30 days of the date of newspaper publication of this notice in the manner set forth in the **AGENCY CONTACTS AND INFORMATION** paragraph below.

After the deadline for public comment, the executive director will consider the comments and prepare a response to all public comment. The response to comments, along with the executive director's decision on the application will be mailed to everyone who submitted public comments or is on a mailing list for this application.

OPPORTUNITY FOR A CONTESTED CASE HEARING. A contested case hearing is a legal proceeding similar to a civil trial in state district court. A person who may be affected by emissions of air contaminants from the facility is entitled to request a hearing. A contested case hearing request must include the following: (1) your name (or for a group or association, an official representative), mailing address, daytime phone number, and fax number, if any; (2) applicant's name and permit number; (3) the statement "I/we request a contested case hearing;" (4) a specific description of how you would be adversely affected by the application and air emissions from the facility in a way not common to the general public; (5) the location and distance of your property relative to the facility; and (6) a description of how you use the property which may be impacted by the facility. If the request is made by a group or association, then one or more members who have standing to request a hearing and the interests the group or association seeks to protect must also be identified. You may also submit your proposed

standing to request a hearing and the interests the group or association seeks to protect must also be identified. You may also submit your proposed adjustments to the application/permit which would satisfy your concerns. Requests for a contested case hearing must be submitted in writing within 30 days following this notice to the Office of the Chief Clerk at the address provided in the information section below.

A contested case hearing will only be granted based on disputed issues of fact that are relevant and material to the Commission's decisions on the application. Further, the Commission will only grant a hearing on issues raised by you or others during the public comment period that have not been withdrawn. Issues that are not raised in public comments may not be considered during a hearing.

EXECUTIVE DIRECTOR ACTION. If a timely contested case hearing request is not received or if all timely contested case hearing requests are withdrawn, the executive director may issue final approval of the application. The response to comments, along with the executive director's decision on the application will be mailed to everyone who submitted public comments or is on a mailing list for this application, and will be posted electronically to the CID. If any timely hearing requests are received and not withdrawn, the executive director will not issue final approval of the permit and will forward the application and requests to the Commissioners for their consideration at a scheduled commission meeting.

MAILING LIST. You may ask to be placed on a mailing list to obtain additional information on this application by sending a request to the Office of the Chief Clerk at the address below.

AGENCY CONTACTS AND INFORMATION. Public comments and requests must be submitted either electronically at www.tceq.texas.gov/about/comments.html, or in writing to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. If you communicate with the TCEQ electronically, please be aware that your email address, like your physical mailing address, will become part of the agency's public record. For more information about this permit application or the permitting process, please call the Public Education Program toll free at 1-800-687-4040. Si desea informacion en Espanol, puede llamar al 1-800-687-4040.

Further information may also be obtained from Rhodia Inc at the address stated above or by calling Mr. Floyd Dickerson, Environmental Manager at (713) 924-1408.

Notice Issuance Date: December 5, 2011

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Rhodia Inc.

Permit No.: 4802 and PSDTX1260

AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §

COUNTY OF HARRIS §

Before me, the undersigned authority, on this day personally appeared

EDWARD SILVA, who being by me duly sworn,
(name of newspaper representative)

deposes and says that (s)he is the AIR CLERK
(title of newspaper representative)

of the HOUSTON CHRONICLE; that said newspaper is generally circulated
(name of newspaper)

in HOUSTON, HARRIS COUNTY, Texas;
(in the municipality or nearest municipality to the location of the facility or the proposed facility)

that the attached notice was published in said newspaper on the following date(s):

AD# 25170891 ACCT# 002695221 12-22-11

Edward Silva
(newspaper representative's signature)

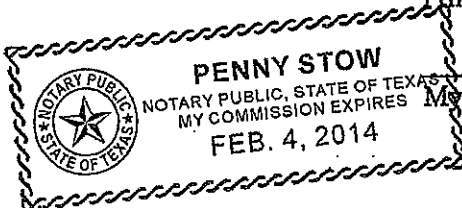
Subscribed and sworn to before me this the 26 day of DECEMBER, 20 11,
to certify which witness my hand and seal of office.

[Signature]
Notary Public in and for the State of Texas

(Seal)

PENNY STOW
Print or Type Name of Notary Public

2/4/14
Commission Expires



TO ALL INTERESTED PERSONS AND PARTIES:

Rhodia Inc. has applied to the Texas Commission on Environmental Quality (TCEQ) for amendment of Air Quality Permit Number 4802 and issuance of Prevention of Significant Deterioration (PSD) Air Quality Permit PSDTX1260, which would authorize construction of a caustic scrubber at the Regeneration Unit No. 2 at 8615 Manchester St., Houston, Harris County, Texas 77012. Additional information concerning this application is contained in the public notice section of this newspaper.

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Rhodia Inc.

Permit No.: 4802 and PSDTX1260

ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS

§

COUNTY OF HARRIS §

Before me, the undersigned authority, on this day personally appeared

EDWARD SILVA, who being by me duly sworn, deposes
(name of newspaper or publication representative)

and says that (s)he is the AIR CLERK
(title of newspaper or publication representative)

of the HOUSTON CHRONICLE DBA LA 102, that said newspaper or publication is generally circulated
(name of newspaper or publication)

in HOUSTON, HARRIS COUNTY, Texas;
(in the municipality or the same county as the location of the facility or the proposed facility)

that the attached notice was published in said newspaper or publication on the following date(s):

AD#25170893 ACCT#002695221 12-25-11

Edward Silva

(newspaper or publication representative's signature)

Subscribed and sworn to before me this the 26 day of DECEMBER, 20 11

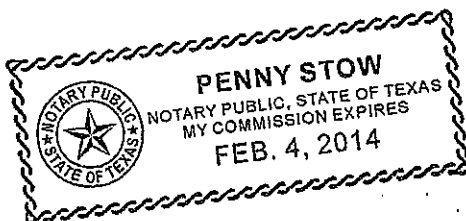
to certify which witness my hand and seal of office.

Penny Stow
Notary Public in and for the State of Texas

(Seal)

Penny Stow
Print or Type Name of Notary Public

2/4/14
My Commission Expires



TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Rhodia Inc.

Permit No.: 4802 and PSDTX1260

ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING
STATE OF TEXAS §
COUNTY OF HARRIS §

Before me, the undersigned authority, on this day personally appeared

EDWARD SILVA, who being by me duly sworn, deposes
(name of newspaper or publication representative)

and says that (s)he is the AIR CLERK
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(name of newspaper or publication)

in HOUSTON, HARRIS COUNTY, Texas;
(in the municipality or the same county as the location of the facility or the proposed facility)

that the attached notice was published in said newspaper or publication on the following date(s):

AD# 25170895 Acct# 002695221 12-25-11

Edward Silva

(newspaper or publication representative's signature)

Subscribed and sworn to before me this the 26 day of DECEMBER, 20 11

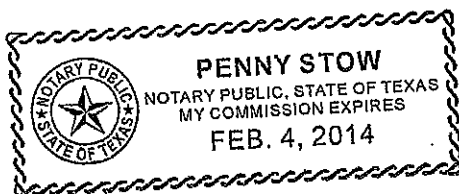
to certify which witness my hand and seal of office.

Penny Stow
Notary Public in and for the State of Texas

(Seal)

PENNY STOW
Print or Type Name of Notary Public

2/4/14
My Commission Expires





V12 LA VOZ DE HOUSTON

| ENTRETENIMIENTO |

DOMINGO 25 DE DICIEMBRE DE 2011

DICIEMBRE



A TODAS LAS PERSONAS Y PARTES INTERESADAS:

Vopak Terminal Galena Park, Inc., ha solicitado a la Comisión de Calidad Ambiental de Texas (TCEQ) una enmienda del Permiso Num. 2480A de Calidad del Aire, la cual autorizará una modificación del Terminal de Almacenamiento de Líquidos a Granel ubicado en 1500 Clinton Dr., Galena Park, Condado de Harris, Texas 77547. En la sección de avisos públicos de este periódico se encuentra información adicional sobre esta solicitud.

A TODAS LAS PERSONAS Y PARTES INTERESADAS:

The Dow Chemical Company, ha solicitado a la Comisión de Calidad Ambiental de Texas (TCEQ) una enmienda del Permiso Num. 77713 de Calidad del Aire, la cual autorizará una modificación para la planta de espuma de polietileno sacado ubicada en 550 Independence Parkway South, La Porte, Condado de Harris, Texas 77571. En la sección de avisos públicos de este periódico se encuentra información adicional sobre esta solicitud.

A TODAS LAS PERSONAS Y PARTES INTERESADAS:

Rhodia Inc., ha solicitado a la Comisión de Calidad Ambiental de Texas (TCEQ) para enmendar el Permiso Num. 4802 de Calidad Atmosférica y la expedición del Permiso Num. PSDTX1260 para Prevención de Deterioro Significativo (PSD), que autorizará la construcción de un depurador caústico en la Planta de Regeneración Num. 2 en 8615 Manchester Street, Houston, Condado de Harris, Texas 77012. Información adicional sobre esta solicitud se encuentra en la sección de avisos públicos de este periódico.



DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

SECRETARY

A/AI/PE 110000450100
L100 VLE L100 VLE

GENERAL PERMIT BRIEFING SHEET

Certified Mail No. 7005 1160 0005 2991 3104

Activity No. PER20060003

Agency Interest No. 1314

Oil and Gas Production (Type of Facility)

Agency Interest Name: Rhodia, Inc.

Company Name: Rhodia, Inc.

Parish: East Baton Rouge

Physical Location:

1275 Airline Hwy.

Baton Rouge, LA 70821-0828

Contact:

Marcus Lewis

Plant Manager

P.O. Box 828

Baton Rouge, LA 70821-0828

RECEIVED
2006 MAY 16 PM 3:11
AIR PERMITS SECTION
SPD-R

Type of Source:

Existing

X
New

Modified

Renewal

Operation of this facility is hereby authorized under LAC 33:III.Chapter 5 subject to the facility specific requirements and the general conditions attached. This authorization shall expire at midnight on the 28th of April, 2011 unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this authorization shall remain in effect until such time as the permitting authority takes final action on the application for authorization renewal. The permit number and the agency interest number should be referenced in future correspondence regarding this facility.

Permit No.: 3032-V0

Chuck Carr Brown, Ph.D.

Assistant Secretary

4/28/06

Date

CCB:mv

c: EPA Region VI

ENVIRONMENTAL SERVICES

: PO BOX 4313, BATON ROUGE, LA 70821-4313

P:225-219-3181 F:225-219-3309

WWW.DEQ.LOUISIANA.GOV

**GENERAL PERMIT
BRIEFING SHEET**

Page 2

Rhodia, Inc.
Agency Interest No.: 1314; PER20060003
Back-up Boiler – Sulfuric Acid Plant
Baton Rouge, East Baton Rouge Parish, Louisiana

Origin:

The original application and Emission Inventory Questionnaire (EIQ), dated April 20, 2006 requested an initial Part 70 Title V General Operating permit for a back-up boiler.

Rhodia Inc. (Rhodia) operates a Sulfuric Acid Plant located in Baton Rouge, East Baton Rouge Parish, Louisiana. The facility produces sulfuric acid by using two sulfuric acid production trains (Unit No. 1 and Unit No. 2). Unit No. 1 was constructed in 1953 and unit No. 2 was constructed in 1968. State Operating Permit No. 2038 dated November 12, 1990 incorporated a Package Boiler. Previously the facility operated under Permit 0840-00033-02 dated June 12, 1995. Currently the facility operates under Permit 0840-00033-V0 dated October 12, 2005.

This is the Initial Part 70 Title V General operating permit for the Back-up Boiler facility.

Emissions Summary

Pollutant	Hourly Maximum	Annual*
	lb/hr	TPY
PM ₁₀	0.99	0.43
SO ₂	0.08	0.04
NO _x	5.05	2.21
CO	3.59	1.57
VOC	0.72	0.32

* The emissions are based on 876 hrs/yr operating time.

Facility Process Description:

Rhodia receives spent sulfuric acid and hazardous waste fuels from off-site sources and recovers the sulfur and energy values in its industrial furnaces, forming fresh sulfuric acid. The sulfuric acid production process begins with treatment of the feed streams in the industrial furnace. Liquids are sprayed using atomizers into the combustion chamber. Normal operating conditions are 2 to 4% excess furnace oxygen and furnace temperature between 1800°F and 2200°F at the furnace discharge. Furnace residence time is approximately three seconds. The feed streams are producing steam for process use. Gas from the waste heat boiler is further cooled and cleaned in the gas scrubbing system. This system includes spray scrubbing and wet electrostatic precipitators to remove acid mist and particulate emissions.

Cooling systems reduce the gas temperature from 600°F to 100°F. The wet gas is then dried through counter-current packed flow columns circulating ≥93% sulfuric acid. Dry gas is heated to 800°F before the sulfur dioxide is converted to sulfur trioxide using catalyst. Because the conversion step to sulfur trioxide is exothermic, the hot exhaust gas is used to heat up the incoming feed by cross-current heat exchange.

**GENERAL PERMIT
BRIEFING SHEET**

Page 3

Rhodia, Inc.
Agency Interest No.: 1314; PER20060003
Back-up Boiler – Sulfuric Acid Plant
Baton Rouge, East Baton Rouge Parish, Louisiana

Facility Process Description:

Sulfur trioxide from the converter enters a countercurrent packed absorption tower. Strong sulfuric acid absorbs and hydrolyzes the sulfur trioxide to sulfuric acid. The demisters are the final pollution control device, removing primarily sulfuric acid mist generated in the acid tower. The demisters also capture any remaining HCl and particulate emissions.

The preceding process description pertains to Unit No. 1. The Unit No. 2 process is slightly different. After the drying step, the gas enters a second sulfur burning furnace, followed by a hot gas filter. This added step heats the gas, affording a second occasion for combustion. Unit No. 2 has over twice the capacity of Unit No. 1. Equipment is sized proportionately, with Unit No. 2 having a longer residence time.

Rhodia's Baton Rouge Facility consists of the Sulfuric Acid Plant (Permit 0840-00033-V0) and CathyVal Plant (Permit 2184-V0). Under normal operation, the Sulfuric Acid Plant provides all the steam needed to run the CathyVal Plant. Rhodia has a permitted package boiler that provides a backup supply of steam when one or both of the Sulfuric Acid Plant Units are down. However, this package boiler does not provide enough steam to keep the CathyVal Plant running at full rate when the Sulfuric Acid Unit No. 2 is down. Historically Rhodia has supplemented the package boiler by renting a second boiler (typically < 100 MMBtu/hr) on a case-by-case basis (via variance). It would be more economic to keep a back-up boiler (natural-gas fired) onsite long term. Rhodia needs the back-up boiler to be onsite beginning May 1, 2006 for a Unit No. 2 turnaround in the Sulfuric Acid Plant. The proposed boiler Rhodia intends to rent is rated at 133 MMBtu/hr. In addition Rhodia will limit the annual capacity factor per 40 CFR 60.44b(j) to 10% or less (at least for the first year).

This activity does not meet the criteria in LAC 33:III.501.B5.B32 for an insignificant activity because LAC 33:III.501. B5 states that if a federally applicable requirement (i.e. NSPS Db) applies, the activity is not insignificant and a permit is required.

The emissions of this permit do not exceed the permitted limitations of the existing boiler (Unit No. 2) in the Sulfuric Acid Plant.

**GENERAL PERMIT
BRIEFING SHEET**

Page 4

Rhodia, Inc.
Agency Interest No.: 1314; PER20060003
Back-up Boiler – Sulfuric Acid Plant
Baton Rouge, East Baton Rouge Parish, Louisiana

Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

Insignificant Activities

There are no insignificant activities at this site.

General Condition XVII Activities:

There are no General Condition XVII activities at this site.

Ambient Air Impact

Type of Dispersion Modeling Used: None

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
—	—	—	—

Type of Review

Rhodia's application was reviewed for compliance with 40 CFR Part 70 and the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS) and Compliance Assurance Monitoring (CAM). Prevention of Significant Deterioration (PSD) and National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations do not apply.

This facility is a major source of toxic air pollutants.

**GENERAL PERMIT
BRIEFING SHEET**

Page 5

Rhodia, Inc.

Agency Interest No.: 1314; PER20060003

Back-up Boiler – Sulfuric Acid Plant

Baton Rouge, East Baton Rouge Parish, Louisiana

Public Notice

Request for public comment on this General Permit was published in The Louisiana Register, on October 20, 2004, The Advocate, Baton Rouge; The Times-Picayune, New Orleans; The News-Star, Monroe; The Lake Charles American Press, Lake Charles; The Times of Shreveport, Shreveport; The Advertiser, Lafayette; the Town Talk of Alexandria, Alexandria and in the Courier of Houma, Houma on October 14, 2004. Several non-technical comments were received and considered prior to approval.

TABLE 1. APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS

Rhodia, Inc.
 Agency Interest No.: 1314; PER20060003
 Back-up Boiler – Sulfuric Acid Plant
 Baton Rouge, East Baton Rouge Parish, Louisiana

ID No.	Description	LAC 33:III																	
		5 [▲]	9	11	13	15	2103	2104*	2109	2111	2113	2115	2116*	2122	22	29*	51*	56	59
EQT 186	1-06 – Back-up Boiler			1	1	1						3							

* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the “Specific Requirements” report specifically states that the regulation is State Only.

TABLE 1. APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS

Rhodia, Inc.
 Agency Interest No.: 1314; PER20060003
 Back-up Boiler – Sulfuric Acid Plant
 Baton Rouge, East Baton Rouge Parish, Louisiana

ID No.	Description	40 CFR 60										40 CFR 61				40 CFR 63				40 CFR Part		
		A	D	Db	Dc	K	Ka	Kb	GG	VV	III	A	M	V	FF	A	F	G	H	64	68	72
EQT 186	1-06 Back-up Boiler	1	3	1	3												3	3				

KEY:

1. The regulations have applicable requirements, which apply to this particular emission source. The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
2. The regulations have applicable requirements, which apply to this particular emission source, but the source is currently exempt from these requirements due to meeting specific criteria, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
3. The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

**TABLE 2. APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS
EXPLANATION FOR EXEMPTION STATUS OF A SOURCE**

Rhodia, Inc.
Agency Interest No.: 1314; PER20060003
Back-up Boiler – Sulfuric Acid Plant
Baton Rouge, East Baton Rouge Parish, Louisiana

ID No:	Requirement	Notes
EQT 186 1-06 Back-up Boiler	Control Emission of Organic Compounds LAC 33:III.2115	DOES NOT APPLY – No waste gas streams enter the equipment.
	NSPS Subpart D – Standards of Performance for Fossil Fuel Fired Steam Generating Units 40 CFR 60.40(a)(1)	DOES NOT APPLY – Boiler is not utilized to generate power and it has a heat input capacity of < 250 MM Btu/hr.
	NSPS Subpart Da – Standards of Performance for Electric Utility Steam Generating Units 40 CFR 60.40a(a)(1)	DOES NOT APPLY – Boiler is not utilized to generate power and it has a heat input capacity of < 250 MM Btu/hr.
	NSPS Subpart Dc – Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units 40 CFR 60.40c(a)	DOES NOT APPLY – Boiler has a heat input capacity of greater than 100 MM Btu/hr.
	NSPS Subpart J – Standards of Performance for Petroleum Refineries 40 CFR 60.100(b) and (e)	DOES NOT APPLY – Boiler is not located in a petroleum refinery.
	NESHAP for Source Categories Subparts F and G 40 CFR 63.101	DOES NOT APPLY – Source does not meet the definition of process vent.

The above table provides explanation for the non-applicability or exemption status of a source cited by 1, 2, or 3 in the matrix presented in Table 1 above of this permit.

40 CFR PART 70 GENERAL CONDITIONS

- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]

40 CFR PART 70 GENERAL CONDITIONS

- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];
 2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];
 3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and
 4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]
- I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit.
[Reference 40 CFR 70.6(a)(3)(ii)(B)]
- J. Records of required monitoring shall include the following:
1. the date, place as defined in the permit, and time of sampling or measurements;
 2. the date(s) analyses were performed;
 3. the company or entity that performed the analyses;
 4. the analytical techniques or methods used;
 5. the results of such analyses; and
 6. the operating conditions as existing at the time of sampling or measurement.
- [Reference 40 CFR 70.6(a)(3)(ii)(A)]
- K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Surveillance Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]

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- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]
- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Surveillance Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]
- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]
- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
 - 1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
 - 2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;

40 CFR PART 70 GENERAL CONDITIONS

3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;
 4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;
 5. changes in emissions would not qualify as a significant modification; and
 6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]
- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Surveillance Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33:I. Chapter 39.
 2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
 3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
 - a. Report by June 30 to cover January through March
 - b. Report by September 30 to cover April through June
 - c. Report by December 31 to cover July through September
 - d. Report by March 31 to cover October through December
 4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33:I. Chapter 39, LAC 33:III. Chapter 9, and LAC 33:III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]

40 CFR PART 70 GENERAL CONDITIONS

- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]
- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
 2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
 3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
 4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
 5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
 6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]
- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.
- The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]
- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly

40 CFR PART 70 GENERAL CONDITIONS

average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated April 20, 2006.
- IV. This permit shall become invalid, for the sources not constructed, if:
 - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.
- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

approval from the Office of Environmental Assessment, Air Quality Assessment Division.

- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Surveillance Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Surveillance Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
 - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
 - C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
 - 1. Report by June 30 to cover January through March
 - 2. Report by September 30 to cover April through June
 - 3. Report by December 31 to cover July through September
 - 4. Report by March 31 to cover October through December
 - D. Each report submitted in accordance with this condition shall contain the following information:
 - 1. Description of noncomplying emission(s);
 - 2. Cause of noncompliance;
 - 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
 - 4. Steps taken by the permittee to reduce and eliminate the noncomplying

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- emissions; and
5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
- B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
- C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
- D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.
- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.
- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services, Air Permits Division, within ninety (90) days after the event, to amend this permit.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:

1. Generally be less than 5 TPY
2. Be less than the minimum emission rate (MER)
3. Be scheduled daily, weekly, monthly, etc., or
4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division
La. Dept. of Environmental Quality
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

- XIX. Certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20060003

Permit Number: 3032-V0

Air - Title V General Permit Initial

EQT186

1-06 - Rental Boiler

- 1 Opacity \leq 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.B]
Which Months: All Year Statistical Basis: None specified
- 2 Opacity \leq 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]
Which Months: All Year Statistical Basis: Six-minute average
- 3 Sulfur dioxide: Discharge gases shall not exceed 2000 ppmv for 3 hr average. [LAC 33:III.1503.C]
- 4 Operating time \leq 876 hr/yr. Non compliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if operating time exceeds the maximum listed in this specific condition for any twelve consecutive month period. [LAC 33:III.501.C.6]
Which Months: All Year Statistical Basis: None specified
- 5 Operating time monitored by technically sound method as needed. [LAC 33:III.501.C.6]
Which Months: All Year Statistical Basis: None specified
- 6 Operating time recordkeeping by electronic or hard copy monthly. Keep records of the rental boiler operating time for each month, as well as the operating time for the last twelve months. Make records available for inspection by DEQ personnel. [LAC 33:III.501.C.6]
- 7 Operating time Submit report: Due annually, by the 31st of March. Report the rental boiler operating time for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division. [LAC 33:III.501.C.6]
- 8 Operating time: Operating only when Unit No.2, permitted in the Sulfuric Acid Plant Permit 0840-00033-V0 is down. [LAC 33:III.501.C.6]
- 9 All affected (NSPS) stationary sources comply with applicable provisions of this subpart. [40 CFR 60.1 - 20]
- 10 Maintain emissions of particulate matter and sulfur dioxide to rates indicated in this subpart. Take federal enforceable condition to limit operating time to comply with nitrogen oxide emission limits as per 40 CFR 60.44b(k). Conduct performance test within 189 days to establish boiler maximum capacity. [40 CFR 60.40b(a)]
- 11 Determine maximum heat input capacity of the steam generating unit at maximum capacity for 24 hours. Use the heat loss method described in sections 5 and 6.3 of the ASME Power Test Codes 4.1 (see IBR 40 CFR 60.17(h)). This demonstration of maximum heat input capacity shall be made during the initial performance test. It shall be made within 60 days after achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup of each facility. [40 CFR 60.44b(j)]
- 12 Report information specified in 40 CFR 60.49b(d); (o); (p); (q) and (w). Semi-annual reporting. [40 CFR 60.49b]
- 13 Conduct performance testing no later than 180 days after initial startup. [40 CFR 60.8(a)]
- 14 Submit notifications of data of start of construction, anticipated startup of the facility, and actual startup of the facility as required by 40 CFR 60.7. [40 CFR 60.Subpart A]

L100 V.6?
(2011)

**AIR, PESTICIDES, AND TOXICS
6TH FLOOR RECORDS CENTER
INFILE / NEW FILE FORM**

New file: ☐

or

Infiling: ☒

Choose from the file types below:

Air Facility

- ☐ AR- Acid Rain
- ☐ CB- Confidential Business
- ☐ CO- Compliance
- ☐ EN- ** Enforcement
- ☐ GE- General
- ☒ PE- Permit
- ☐ RA- Regulatory Applicability
- ☐ Other:

TSCA

- ☐ AH - Asbestos Hazard Emergency Response Act
- ☐ AS or AW - Asbestos or Asbestos Worker Prot.
- ☐ CB - Confidential
- ☐ SI - Site Specific
- ☐ FO - Non Site Specific
- ☐ IM - ** Section 5 * 8
- ☐ LB - ** Lead
- ☐ PC - **PCB

** Extension of File Type (if needed):

- ☐ ES - Enforcement Sensitive
- ☐ DP - Docket Number

☐ **EPCRA / SARA**

☐ **FIFRA**

Proj No:	74
LDEQ AI:	1314

Permit Type	Number
Minor Pmt No:	
PSD Pmt No:	
TV Pmt No:	0840-00033-V4
NNSR Pmt No:	
CAIR Pmt No:	
AR Pmt No:	

FRS Number: Company Name:

Site Name: Area Name:

Fac Street: Fac City:

Fac Cnty: Fac State: Fac Zip:

Requestor's Name:

Requestor's Phone:

Materials Sent To File Room

Application: Format: Paper

Permit(s):



December 15, 2011

Mr. Sanford Phillips, Assistant Secretary (**Hand Delivered**, original + 2 copies)
Louisiana Department of Environmental Quality
Office of Environmental Services; Air Permits Division
P.O. Box 4313
Baton Rouge, LA 70821-4313

EPA Region 6 (6PD-R)
1445 Ross Avenue, Ste. 1200
Dallas, TX 75202-2733

Subject: Application for **Minor Permit Modification to Part 70 Permit**
Sulfuric Acid Plant; Title V Permit No. 0840-0033-V3
Rhodia, Inc., Baton Rouge, LA ; Agency Interest No. 1314

Dear Mr. Phillips:

On May 11, 2011, LDEQ issued a Title V Permit Renewal to Rhodia for the Sulfuric Acid Plant. Rhodia is requesting that minor permit modification procedures be used to reconcile emission rates and make other minor corrections/updates. The requested changes do not modify, remove, or add any federally-enforceable applicable requirements nor have any new federally-enforceable requirements become applicable since the last permit modification/renewal. A draft permit is not included (per LAC 33:III.525.B.2.c) because the requested changes are minor and the overall permit will remain largely unchanged.

LAC 33:III.525.B.2.b requires certification by responsible official that the proposed modification meets the criteria listed in LAC 33:III.525.A for a minor modification. Per LAC 33:III.525.A.2.f, a proposed modification is not a minor modification if it seeks to establish or exceed an enforceable emissions cap, assumed to establish minor source status or to avoid classification as a Title I modification. The proposed "modification" (emissions reconciliation only) includes a 0.26 tpy increase in the HAP emissions cap; the site remains an area source of HAPs. Per conversation on 12-15-11 with LDEQ personnel, since the site remains an area source of HAPs, the permit modification can be handled as a minor modification but will be sent to 30-day public notice. By signature below, I certify that the proposed modification meets the other criteria in LAC 33:III.525.A.2 for a minor modification.

If you have any questions or require any further information, please call John Richardson at 359-3768 or Julie Sheffield at 359-3432.

Sincerely,

Daniel Tate
Plant Manager

File 402.1.2

RECEIVED
11 DEC 27 PM 5:31
AIR PERMITS SECTION
6PD-R

Department of Environmental Quality
Office of Environmental Services
Air Permits Division
P.O. Box 4313
Baton Rouge, LA 70821-4313
(225) 219-3181

LOUISIANA

Application for Approval of Emissions of Air Pollutants from Part 70 Sources



PLEASE TYPE OR PRINT

1. Facility Information [LAC 33:III.517.D.1]

Facility Name or Process Unit Name (if any) Sulfuric Acid Plant		<input type="checkbox"/> All Process Units <input checked="" type="checkbox"/> Process Unit-Specific Permit
Agency Interest Number (A.I. Number) 1314	Currently Effective Permit Number(s) 0840-00033-V3	
Company - Name of Owner Rhodia, Inc.		
Company - Name of Operator (if different from Owner) N/A		
Parent Company (if Company - Name of Owner given above is a division) The Solvay Group		

Ownership:

Check the appropriate box.

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> corporation, partnership, or sole proprietorship | <input type="checkbox"/> regulated utility | <input type="checkbox"/> municipal government |
| <input type="checkbox"/> state government | <input type="checkbox"/> federal government | <input type="checkbox"/> other, specify _____ |

2. Physical Location and Process Description

[LAC 33:III.517.D.18, unless otherwise stated]

What does this facility produce? Add more rows as necessary

Sulfuric Acid

What modifications/changes are proposed in this application? Add more rows as necessary.

see next page

Nearest town (in the same parish as the facility):

Parish(es) where facility is located:

Baton Rouge			East Baton Rouge					
Distance To (mi):	~222	Texas	~269	Arkansas	~129	Mississippi	~262	Alabama
Latitude Front Gate:	30	Deg	30	Min	30	Sec	30	Hundredths
Longitude Front Gate:	-91	Deg	11	Min	16	Sec	58	Hundredths
Distance from nearest Class I Area	225	Kilometers						

Add physical address and description of location of the facility below. If the facility has no address, provide driving directions. Add more rows as necessary.

1275 Airline Highway, Baton Rouge, LA 70805. Rhodia is located immediately north of Highway 190 along the east bank of the Mississippi River.

- ☒ Map attached (required per LAC 33:III.517.D.1)
- ☐ Description of processes and products attached (required per LAC 33:III.517.D.2) *NOTE: no change from current permit*
- ☒ Introduction/Description of the proposed project attached (required per LAC 33:III.517.D.5)

What modifications/changes are proposed in this application? Add more rows as necessary.

Modifications Addressed in Permit Application Forms:

- Emissions of hydrochloric acid and chlorine from the Unit 1 (RLP 0014) and Unit 2 (RLP 0013) Sulfuric Acid Regeneration Unit (SARU) stacks are being reconciled based upon recent stack test data and conservative assumptions used to extrapolate the existing data. Hydrochloric acid emission rates are being decreased while chlorine emissions are being increased for an overall slight increase in these Class III TAPs. Also, the VOC emissions from the Unit 1 and Unit 2 SARUs are being reconciled to use a lbs/ton emissions factor calculated from stack test data instead of using the straight lbs/hr stack test result. Because the annual emissions for Units 1 and 2 are part of emission caps, multiple EIQ sheets are affected (RLP 0014 and RLP 0013 for max hourly emissions, CAP-Comb for average/annual total VOCs, and CAP-SAU for average/annual chlorine and hydrochloric acid emissions).
- The Package (ABCO) Boiler (EQT 0153) is being combined in emissions cap "CAP-Comb" (with no change in overall emissions) to better reflect its function as supplemental/backup steam to the Unit 1 and Unit 2 SARUs which are the primary steam-generating units for the site. Revised EIQ sheets for the Package Boiler and CAP-Comb are included.
- The Treatment Services Vapor Combustor (TSVC, EQT 0147) and Acid Plant Vapor Combustor (APVC, EQT 0151) emissions are being reconciled based upon recent stack test data.
- General Condition XVII Activities and Insignificant Activities are being updated/revised.
- Minor adjustment in RLP 0013 and RLP 0014 stack parameters using more recent design data

Other Modifications/Corrections:

- Change SR 12 to say "Because this scrubber is a portable unit, permittee may occasionally move it and substitute a different scrubber unit. All specific requirements and emission limits will continue to apply." This change is needed because the permits referred to by the existing SR 12 have been rescinded, thus if a substitute scrubber is used, it will simply comply with the same requirements as the primary unit.
- SR 306 is incorrect for source EQT 0291; it mentions "sweet natural gas" whereas this is a diesel engine. Also note that this regulation (LAC 33:III.1101.B) has been revised such that the exception now reads "except that such emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes".
- LAC 33:III.1101.B is assigned to many other sources and should reflect the revised regulatory language, if possible
- On page 23 of the Air Permit Briefing Sheet (LDAR program streamlining), item a refers to "LA MACT for Refineries". This should state "LA MACT Determination for non-HON Facility Equipment Leaks"
- The Emission Rate Tables have 3 sets (phases) of SO₂ emission rates. Note that we are now in Phase II thus Phase I can be deleted.
- Due to emissions rate reconciliation, the total permitted HAPs will increase from 8.92 to 9.18 tons per year. The total HAPs for the Acid Plant are sum of (TAP CAP on PCS 0001; TAP CAP on PCS 0002; HCl and Cl₂ emissions from CAP-SARU, TSVC, APVC; HAP metals from CAP-SARU; CS₂ from sulfur feed tank; gasoline tank HAPs). SR 364 addresses the total HAP limit and needs to be updated.
- The "Emission Rate Notes" at the end of the Emission Rate Tables for pollutant "Toxic Air Pollutants" on process groups PCS 0001 and PCS 0002 need to be revised. The text after the second sentence is incorrect (confuses TAPs and HAPs) and should be truncated.
- There is a typo in item GC5, should say "spent" instead of "spend"

3. Confidentiality [LAC 33.I.Chapter 5]

Are you requesting confidentiality for any information except air pollutant emission rates?

☐ Yes ☒ No

If "yes," list the sections for which confidentiality is requested below. Add rows as necessary. Confidentiality requests require a submittal that is separate from this application. Information for which confidentiality is requested should not be submitted with this application. Consult instructions.

4. Type of Application [LAC 33:III.517.D]

Complete the appropriate column (1 or 2) that corresponds to the type of permit being sought. Check all that apply within the appropriate column.

Column 1	Column 2
<input type="checkbox"/> Part 70 General	<input checked="" type="checkbox"/> Part 70 Regular
<input type="checkbox"/> Renewal	<input type="checkbox"/> Renewal
Select one, if applicable: <input type="checkbox"/> Entirely new facility <input type="checkbox"/> Modification or expansion of existing facility (may also include reconciliations) <input type="checkbox"/> Reconciliation only <input type="checkbox"/> Individual emissions unit(s) addition	Select one, if applicable: <input type="checkbox"/> Entirely new facility <input type="checkbox"/> Significant modification or expansion of existing facility (may also include reconciliations) [LAC 33:III.527] <input type="checkbox"/> Minor modification or expansion of existing facility (may also include reconciliations) [LAC 33:III.525] <input checked="" type="checkbox"/> Reconciliation only NSR Analysis: <input type="checkbox"/> PSD <input type="checkbox"/> NNSR

Does this submittal update or replace an application currently under review?

☐ Yes ☒ No

If yes, provide date that the prior application was submitted:

Select one if this application is for an existing facility that does not have an air quality permit:

- ☐ Previously Grandfathered (LAC 33:III.501.B.6)
☐ Previously Exempted (e.g., Small Source Exemption; LAC 33:III.501.B.2.d)
☐ Previously Unpermitted

5. Fee Information [LAC 33:III.517.D.17]

Fee Parameter: If the fee code is based on an operational parameter (such as number of employees or capital cost), enter that parameter here. per ton daily rate capacity

Industrial Category: Enter the Standard Industrial Classification (SIC) and North American Industry Classification (NAICS) Codes that apply to the facility.

Primary SICC: 2819 **NAICS Code:** 325188

Secondary SICC(s): N/A

Project Fee Calculation: Enter fee code, permit type, production capacity/throughput, and fee amount pursuant to LAC 33:III.Chapter 2. Add rows to this table as needed. Include with the application the amount in the Grand Total blank as the permit application fee.

FEE CODE	TYPE	EXISTING CAPACITY	INCREMENTAL CAPACITY INCREASE	SURCHARGES				TOTAL AMOUNT
				MULTIPLIER	NSPS	PSD	AIR TOXICS	
0540	minor				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ 1,556.00
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
GRAND TOTAL								\$ 1,556.00

****Optional** Fee Explanation:** Use the space provided to give an explanation of the fee determination displayed above. Using this area will help to avoid confusion.

Minimum minor mod fee applies per LAC 33:III.211.B.13.d. Emissions are being reconciled only.

Electronic Fund Transfer (EFT): If paying the permit application fee using an Electronic Fund Transfer (EFT), please include the EFT Transaction Number, the Date that the EFT was made, and the total dollar amount submitted in the EFT. If not paying the permit application fee using EFT, leave blank.

EFT Transaction Number

Date of Submittal

Total Dollar Amount

\$

6. Key Dates

Estimated date construction will commence:

Estimated date operation will commence:

7. Pending Permit Applications – For Process Unit-Specific Permits Only

[LAC 33:III.517.D.18]

List all other process units at this facility for which Part 70 permit applications have been submitted, but have not been acted upon by LDEQ as of the date of submittal of this application. If none, state "none" in the table. ****It is not necessary to update this table during the permit review process, unless requested by LDEQ.****

Process Unit Name	Permit Number	Date Submitted
none		

8. LAC 33:I.1701 Requirements – Answer all below for new sources and permit renewals - ☐ Yes ☐ No

Does the company or owner have federal or state environmental permits identical to, or of a similar nature to, the permit for which you are applying in Louisiana or other states? (This requirement applies to all individuals, partnerships, corporations, or other entities who own a controlling interest of 50% or more in your company, or who participate in the environmental management of the facility for an entity applying for the permit or an ownership interest in the permit.)

☐ Yes ☐ No

If yes, list States:

Do you owe any outstanding fees or final penalties to the Department?

If yes, explain below. Add rows if necessary.

☐ Yes ☐ No

Is your company a corporation or limited liability company?

☐ Yes ☐ No

If yes, attach a copy of your company's Certificate of Registration and/or Certificate of Good Standing from the Secretary of State. The appropriate certificate(s) should be attached to the end of this application as an appendix.

9. Permit Shield Request [LAC 33:III.517.E.7]☐ Yes☒ No

no new shields being requested

If yes, check the appropriate boxes to indicate the type of permit shield being sought. Include the specific regulatory citation(s) for which the shield is being requested. Give an explanation of the circumstances that will justify the permit shield request. Attach additional pages if necessary. If additional pages are used, attach them directly behind this page and enter "See Attached Pages" into the Explanation field.

Type of Permit Shield request (check all that apply):

Non-applicability determination for:	Specific Citation(s)	Explanation
<input type="checkbox"/> 40 CFR 60		
<input type="checkbox"/> 40 CFR 61		
<input type="checkbox"/> 40 CFR 63		
<input type="checkbox"/> Prevention of Significant Deterioration		
<input type="checkbox"/> Nonattainment New Source Review		

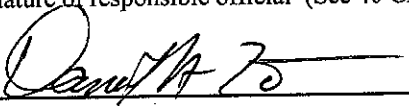
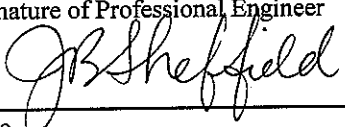
Interpretation of monitoring, recordkeeping, and/or reporting requirements, and/or means of compliance for:	Specific Citation(s)	Explanation
<input type="checkbox"/> 40 CFR 60		
<input type="checkbox"/> 40 CFR 61		
<input type="checkbox"/> 40 CFR 63		
<input type="checkbox"/> Prevention of Significant Deterioration		
<input type="checkbox"/> Nonattainment New Source Review		
<input type="checkbox"/> State Implementation Plan (SIP) Regulation(s) referenced in 40 CFR 52 Subpart T		

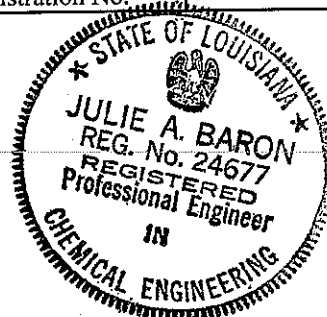
10. Certification of Compliance with Applicable Requirements

Statement for Applicable Requirements for Which the Company and Facility Referenced In This Application Is In Compliance

Based on information and belief, formed after reasonable inquiry, the company and facility referenced in this application is in compliance with and will continue to comply with all applicable requirements pertaining to the sources covered by the permit application, as outlined in Tables 1 and 2 in the permit application. For requirements promulgated as of the date of this certification with compliance dates effective during the permit term, I further certify that the company and facility referenced in this application will comply with such requirements on a timely basis and will continue to comply with such requirements.

For corporations only: By signing this form, I certify that, in accordance with the definition of Responsible Official found in LAC 33:III.502, (1) I am a president, secretary, treasurer, or vice-president in charge of a principal business function, or other person who performs similar policy or decision-making functions; or (2) I am a duly authorized representative of such person; am responsible for the overall operation of one or more manufacturing, production, or operating facilities addressed in this permit application; and either the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars); or the delegation of authority has been approved by LDEQ prior to this certification.*

CERTIFICATION: I certify, under provisions in Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information contained in this Application for Approval of Emissions of Air Pollutants from Part 70 Sources, including all attachments thereto and the compliance statement above, are true, accurate, and complete.			CERTIFICATION: I certify that the engineering calculations, drawings, and design are true and accurate to the best of my knowledge.		
a. Responsible Official			b. Professional Engineer		
Name Daniel Tate			Name Julie Baron Sheffield		
Title Plant Manager			Title Environmental Consultant		
Company Rhodia, Inc.			Company JBS, L.L.C.		
Suite, mail drop, or division			Suite, mail drop, or division		
Street or P.O. Box PO Box 828			Street or P.O. Box PO Box 828		
City Baton Rouge	State LA	Zip 70821	City Baton Rouge	State LA	Zip 70821
Business phone (225) 359-3751			Business phone (225) 359-3432		
Email Address Daniel.Tate@US.RHODIA.com			Email Address Julie.Sheffield@US.RHODIA.com		
Signature of responsible official (See 40 CFR 70.2) 			Signature of Professional Engineer 		
Date 12/15/2011			Date 12-15-2011		
*Approval of a delegation of authority can be requested by completing a Duly Authorized Representative Designation Form (Form 7218) available on LDEQ's website at http://www.deq.louisiana.gov/portal/tabid/2758/Default.aspx			Louisiana Registration No. 24677		



11. Personnel [LAC 33:III.517.D.1]

a. Manager of Facility who is located at plant site			b. On-site contact regarding air pollution control		
Name <input type="checkbox"/> Primary Contact Daniel Tate			Name <input type="checkbox"/> Primary Contact John Richardson		
Title Plant Manager			Title Environmental Manager		
Company Rhodia, Inc.			Company Rhodia, Inc.		
Suite, mail drop, or division			Suite, mail drop, or division		
Street or P.O. Box PO Box 828			Street or P.O. Box PO Box 828		
City Baton Rouge	State LA	Zip 70821	City Baton Rouge	State LA	Zip 70821
Business phone (225) 359-3751			Business phone (225) 359-3768		
Email Address <u>Daniel.Tate@US.RHODIA.com</u>			Email Address <u>John.Richardson@US.RHODIA.com</u>		

c. Person to contact with written correspondence			d. Person who prepared this report		
Name <input checked="" type="checkbox"/> Primary Contact John Richardson			Name <input type="checkbox"/> Primary Contact Julie Sheffield		
Title Environmental Manager			Title Environmental Consultant		
Company Rhodia, Inc.			Company JBS, LLC		
Suite, mail drop, or division			Suite, mail drop, or division		
Street or P.O. Box PO Box 828			Street or P.O. Box PO Box 828		
City Baton Rouge	State LA	Zip 70821	City Baton Rouge	State LA	Zip 70821
Business phone (225) 359-3768			Business phone (225) 359-3432		
Email Address <u>John.Richardson@US.RHODIA.com</u>			Email Address <u>Julie.Sheffield@US.RHODIA.com</u>		

e. Person to contact about Annual Maintenance Fees		
Name John Richardson		
Title Environmental Manager		
Company Rhodia, Inc.		
Suite, mail drop, or division		
Street or P.O. Box PO Box 828		
City Baton Rouge	State LA	Zip 70821
Business phone (225) 359-3768		
Email Address <u>John.Richardson@US.RHODIA.com</u>		

12. Proposed Project Emissions [LAC 33:III.517.D.3]

List the total emissions following the proposed project for this facility or process unit (for process unit-specific permits). Speciate all criteria pollutants, TAP, and HAP for the proposed project.

Pollutant	Proposed Emission Rate (tons/yr)
<i>The pollutants being modified are listed below. Other pollutants will remain at currently permitted rates and, for brevity, are not listed below.</i>	
PM ₁₀	58.43
SO ₂	phase II: 4726.23
SO ₂	phase III: 1078.06
NO _x	118.64
CO	103.81
VOC Total	29.58
chlorine	1.74
hydrochloric acid	4.34
total HAPs (not same as total TAPs)	9.18

13. History of Permitted Emissions [LAC 33:III.517.D.18]

List each of the following in chronological order:

- The Permit Number and Date Action Issued for each air quality permit that has been issued to this facility or process unit (for process unit-specific permits) within the last ten (10) years.

- All small source exemptions, authorizations to construct, administrative amendments, case-by-case insignificant activities, and changes of tank service that have been approved since the currently effective Title V Operating Permit or State Operating Permit was issued to this facility or process unit (for process unit-specific permits). It is not necessary to list any such activities issued prior to the issuance of the currently effective Title V Operating Permit or State Operating Permit, if one exists.

Permit Number	Date Action Issued
0840-00033-V0	October 12, 2005
0840-00033-V1	March 14, 2007
0840-00033-V2	November 30, 2009
0840-00033-V3	May 11, 2011
Temporary Gasoline Tank - Case-by-Case Notification of Insignificant Activity	July 6, 2011

14.a. Enforcement Actions [LAC 33:III.517.D.18] -

☐ Yes ☒ No

If yes, list all federal and state air quality enforcement actions, settlement agreements, and consent decrees received for this facility and/or process unit (for process unit-specific permits) since the issuance of the currently effective Title V Operating Permit or State Operating Permit. For each action, list the type of action (or its tracking number), the regulatory authority or authorities that issued the action, and the date that the action was issued. Summarize the conditions imposed by the enforcement action, settlement agreement, and consent decree in Section 23, Table 2. It is not necessary to submit a copy of the referenced action. Add rows to table as necessary.

Type of Action or Tracking Number	Issuing Authority	Date Action Issued	Summary of Conditions Included?
			<input type="checkbox"/> Yes <input type="checkbox"/> No

14.b. Schedule for Compliance [LAC 33:III.517.E.4]☐ Yes ☒ No

If the facility or process unit for which application is being made is not in full compliance with all applicable regulations, give a description of how compliance will be achieved, including a schedule for compliance below. Add rows as necessary. See instructions.

15. Letters of Approval for Alternate Methods of Compliance -☐ Yes ☒ No

If yes, list all correspondence with LDEQ, EPA, or other regulatory bodies that provides for or supports a request for alternate methods of compliance with any applicable regulations for this facility or process unit (for process unit-specific permits). List the date of issuance of the letter and the regulation referenced by the letter. **Attach as an appendix a copy of all documents referenced in this table.** Letters that are not included may not be incorporated into a final permit. Add rows to table as necessary.

Date Letter Issued	Issuing Authority	Referenced Regulation(s)	Copy of Letter Attached?
			<input type="checkbox"/> Yes <input type="checkbox"/> No
			<input type="checkbox"/> Yes <input type="checkbox"/> No

16. Initial Notifications and Performance Tests [LAC 33:III.517.E.1]☒ Yes ☐ No

If yes, list any initial notifications that have been submitted or one-time performance tests that have been performed for this facility or process unit (for process unit-specific permits) since the issuance of the currently effective Title V Operating Permit or State Operating Permit in order to satisfy regulatory requirements. Any initial notification or one-time performance test requirements that have not been satisfied should be listed in Section 23, Table 2 of this application. Any notifications or performance tests that recur periodically should also be properly noted in Section 23, Table 2 of this application. Add rows to table as necessary.

Initial Notification or One-time Performance Test?	Regulatory Citation Satisfied	Applicable Source(s)	Date Completed/Approved
Initial 30-Day NOx Performance Test for Package (ABCO) Boiler, EQT 0153	40 CFR 60.8 and 60.46b(e)		Submitted to LDEQ 8/30/11
NOx CEMS Initial Performance Evaluation for Package (ABCO) Boiler, EQT 0153	40 CFR 60.13(c) and 60.49b(b)		Submitted to LDEQ 7/28/11

17. Existing Prevention of Significant Deterioration or Nonattainment New Source Review Limitations [LAC 33:III.517.D.18]

Do one or more emissions sources represented in this permit application currently operate under one or more NSR permits?

☐ Yes ☒ No

If "yes," summarize the limitations from such permit(s) in the following table. Add rows to table as necessary. Be sure to note any annual emissions limitations from such permit(s) in Sections 13 and 14 of this application.

Permit Number	Date Issued	Emission Point ID No.	Pollutant	BACT/LAER Limit ¹	Averaging Period	Description of Control Technology/Work Practice Standards

¹For example, lb/MM Btu, ppmvd @ 15% O₂, lb/ton, lb/hr

18. Air Quality Dispersion Modeling [LAC 33:III.517.D.15]

Was Air Quality Dispersion Modeling as required by LAC 33:III performed in support of this permit application? (Air Quality Dispersion Modeling is only required when applying for PSD permits and as requested by LDEQ.)

☐ Yes ☒ No

Has Air Quality Dispersion Modeling completed in accordance with LAC 33:III ever been performed for this facility in support of a air permit application previously submitted for this facility or process unit (for process unit-specific permits) or as required by other regulations AND approved by LDEQ?

☒ Yes ☐ No

If yes, enter the date the most recent Air Quality Dispersion Modeling results as required by LAC 33:III were submitted:

For sulfuric acid: 10/6/2008; for TAP metals: May 2009; for other TAPs: March 2005; for SO₂, approximately August 2004. The sulfuric acid modeling was submitted as part of a permit application because initial analysis indicated a PSD major modification. Analysis was later revised and the PSD application was withdrawn.

If the answer to either question above is "yes," enter a summary of the most recent results in the following table. If the answer to both questions is "no," enter "none" in the table. Add rows to table as necessary.

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Standard or (National Ambient Air Quality Standard {NAAQS})
Sulfuric Acid	8-hour	22.32 µg/m ³	23.8 µg/m ³
SO ₂ Phase I emission rates (no longer in effect)	annual	21.88 µg/m ³	80 µg/m ³
	24-hour	335.04 µg/m ³	365 µg/m ³
	3-hour	1017.57 µg/m ³	1300 µg/m ³
Antimony (and compounds)	8-hour	0.46624 µg/m ³	11.9 µg/m ³
Arsenic (and compounds)	annual	0.00004 µg/m ³	0.02 µg/m ³
Barium (and compounds)	8-hour	0.88404 µg/m ³	11.9 µg/m ³
Chromium VI (and compounds)	annual	0.00004 µg/m ³	0.01 µg/m ³
Copper (and compounds)	8-hour	0.40913 µg/m ³	23.8 µg/m ³
Manganese (and compounds)	8-hour	0.27827 µg/m ³	4.76 µg/m ³
Nickel (and compounds)	annual	0.00004 µg/m ³	0.21 µg/m ³
Selenium (and compounds)	8-hour	0.35001 µg/m ³	4.76 µg/m ³
Zinc (and compounds)	8-hour	0.80561 µg/m ³	119 µg/m ³
MIBK	8-hour	323 µg/m ³	4880 µg/m ³
Dichloromethane	annual	0.86668 µg/m ³	212.77 µg/m ³
Acrylonitrile	annual	1.152 µg/m ³	1.47 µg/m ³
1,3-Butadiene	annual	0.723 µg/m ³	0.92 µg/m ³
Chlorine	8-hour	26.71 µg/m ³ *	35.7 µg/m ³
Hydrochloric acid	8-hour	134.82 µg/m ³ *	180 µg/m ³

* Because this permit application proposes to increase permitted emissions of chlorine and HCl from some sources, Rhodia will update the modeling and forward results to LDEQ upon request.

19. General Condition XVII Activities -

■ Yes □ No

Enter all activities that qualify as Louisiana Air Emissions Permit General Condition XVII Activities.

- Expand this table as necessary to include all such activities.
- See instructions to determine what qualifies as a General Condition XVII Activity.
- Do not include emissions from General Condition XVII Activities in the proposed emissions totals for the permit application.

ID No.	Work Activity	Schedule	Emission Rates – TPY					
			PM ₁₀	SO ₂	NO _x	CO	VOC	Other
Note: Edits from current GCXVII List shaded gray.								
GC 1	Catalyst reconditioned in Sulfuric Acid Unit Nos. 1 & 2	Once each 12 months per unit	0.2					
GC 2	Drum re-packaging	4 times per year					0.002	
GC 3	Vacuum trucks used for tank cleanouts, spill cleanup, and sump clean out	Weekly		0.06			0.06	
GC 4	Tank and process equipment cleaning			0.1			0.90	
GC 5	Opening of trucks and railcars containing waste fuel and spent acid for sampling, inspection, maintenance, or further processing	Daily		0.5			0.1	
GC 6	Sampling waste fuel trucks, railcars, and tanks via sample tap	10 times per day					0.03	##
GC 7	Sampling spent acid and IFS trucks, railcars, and barges	8 times per day		0.004			0.004	
GC 8	Washing inside surface of Unit 1 exhaust stack	2 times per year			0.25			0.01*
GC 9	Odor-neutralizing compounds						0.06	
GC 10	Manual gauging of tank levels			0.5			0.1	
GC 11	Melting sulfur solidified in piping and other equipment at the old sulfur pit (former EIQ ID 18)			<0.001				<0.001#
GC 12	Sampling for moisture content, stack gauging, and pressure readings from gas streams			0.1				0.1*
GC 13	Loading fresh acid onto heel of spent acid			0.003			0.004	
GC 14	Acid Plant Vapor Combustor (APVC) routine maintenance	240 hrs per year (max)					4.62	**
GC 15	Unloading containers of spent acid with chlorinated VOCs (carbon bed for VOCs, caustic scrubber if any SO2 present)	1 per week		0.1			0.06	**

* Sulfuric Acid Mist

Hydrogen Sulfide

** Speciated VOCs covered by Spent Acid Process permitted emissions

Speciated VOCs covered by TS Process permitted emissions

20. Insignificant Activities [LAC 33:III.501.B.5]

■ Yes □ No

Enter all activities that qualify as Insignificant Activities.

• Expand this table as necessary to include all such activities.

• For sources claimed to be insignificant based on size or emission rate (LAC 33:III.501.B.5.A), information must be supplied to verify each claim. This may include but is not limited to operating hours, volumes, and heat input ratings.

• If aggregate emissions from all similar pieces of equipment (i.e. all LAC 33:III.501.B.5.A.1 activities) claimed to be insignificant are greater than 5 tons per year for any pollutant, then the activities can not be claimed as insignificant and must be represented as permitted emission sources. Consult instructions.

Emission Point ID No.	Description	Physical/Operating Data	Citation
Note: Edits from current IA list are shaded gray.			
20D962	Diesel Storage Tank, Firewater Pump	300 gals	LAC 33: III.501.B5.A.3
90D360	Diesel Storage Tank, Maintenance	1000 gals	LAC 33: III.501.B5.A.3
None	Diesel Storage Tank, IFS	1000 gals	LAC 33: III.501.B5.A.3
91D321	IFS Wash-water Storage Tank	9000 gals	LAC 33: III.501.B5.A.3
90D210	Laboratory Excess Sample Tank	100 gals	LAC 33: III.501.B5.A.2
Hoods	Different Analyses*	N/A	LAC 33: III.501.B5.A.6
	Drum Washing Operations	55 gals	LAC 33: III.501.B5.A.7
None	Temporary (Seasonal) Portable Gasoline Tank	550 gals	LAC 33: III.501.B5.A.8

* Vents associated with exhaust hoods for laboratory equipment used exclusively for routine chemical and physical analysis with the purpose of quality control or environmental monitoring purposes.

21. Regulatory Applicability for Commonly Applicable Regulations – Answer all below [LAC 33:III.517.D.10]

Does this facility contain asbestos or asbestos containing materials?

■ Yes □ No

If “yes,” the facility or any portion thereof may be subject to 40 CFR 61, Subpart M, LAC 33:III.Chapter 27, and/or LAC 33:III.5151 and this application must address compliance as stated in Section 23 of this application.

Is the facility or process unit represented in this permit subject to 40 CFR 68, or is any other process unit located at same facility as the process unit represented in this application subject to 40 CFR 68?

■ Yes □ No

If “yes,” the entire facility is subject to 40 CFR 68 and LAC 33:III.Chapter 59 and this application must address compliance as stated in Section 23 of this application.

Is the facility listed in LAC 33:III.5611

Table 5 ■ Yes □ No

Table 6 ■ Yes □ No

Table 7 ■ Yes □ No

Does the applicant own or operate commercial refrigeration equipment normally containing more than 50 pounds of refrigerant at this facility or process unit?

■ Yes □ No

If “yes,” the entire facility is subject to 40 CFR 82, Subpart F and this application must address compliance as stated in Section 23 of this application.

22. Applicable Regulations, Air Pollution Control Measures, Monitoring, and Recordkeeping

Important points for Table 1 [LAC 33:III.517.D.10]:

- List in Table 1, by Emission Point ID Number and Descriptive Name of the Equipment, state and federal pollution abatement programs and note the applicability or non-applicability of the regulations to each source.
- Adjust the headings for the columns in Table 1 as necessary to reflect all applicable regulations, in addition to any regulations that do not apply but need an applicability determination to verify this fact.
- For each piece of equipment, enter "1" for each regulation that applies. Enter "2" for each regulation that applies to this type of source, but from which this source of emissions is exempt. Enter "3" for equipment that is subject to a regulation, but does not have any applicable requirements. Also, enter "3" for each regulation that have applicable requirements that apply to the particular emission
- Leave the spaces blank when the regulations clearly would not apply under any circumstances to the source. For example, LAC 33:III.2103 – Storage of Volatile Organic Compounds would never apply to a steam generating boiler, no matter the circumstances.
- Consult instructions.

Important points for Table 2 [LAC 33:III.517.D.4; LAC 33:III.517.D.7; LAC 33:III.517.D.10]:

- For each piece of equipment listed in Table 2, include all applicable limitation, recordkeeping, reporting, monitoring, and testing requirements. Also include any one-time notification or one-time tests performance test requirements that have not been fulfilled.
- Each of these regulatory aspects (limitation, recordkeeping, reporting, etc.) should be addressed for each regulation that is applicable to each emissions source or emissions point.
- For each regulation that provides a choice regarding the method of compliance, indicate the method of compliance that will be employed. It is not sufficient to state that all compliance options will be employed, though multiple compliance options may be approved as alternative operating scenarios.
- Consult instructions.

Important points for Table 3 [LAC 33:III.517.D.16]:

- Each time a 2 or a 3 is used to describe applicability of a source in Table 1, an entry should be made in Table 3 that explains the exemption or non-applicability status of the regulation to that source.
- Fill in all requested information in the table.
- The exact regulatory citation that provides for the specific exemption or non-applicability determination should be entered into the Citation Providing for Exemption or Non-applicability column.
- Consult Instructions.

Important points for Table 4 [LAC 33:III.517.D.18]

- List any single emission source that routes its emissions to another point where these emissions are commingled with the emissions of other sources before being released to the atmosphere. Do not list any single emission source in this table that does not route its emissions in this manner.
- List any and all emission sources that are routed as described above. This includes emission sources that do not otherwise appear in this permit application.
- Consult instructions.

TABLE 1: APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS

Note: This table lists regulations that are commonly applicable to many sources, but is not intended to be an all inclusive list. Alter the headings of this table as necessary in order to address ALL potentially applicable requirements.

Source ID No.:	Descriptive Name of the Source	LAC 33:III.Chapter																
		5	9	11	13	15	2103	2104	2111	2113	2116	2123	22	29	51	53	56	59
	<i>There are no changes to applicable regulations with this permit modification application.</i>																	

Blank – The regulations clearly do not apply to this type of emission source.

Source ID No.:	Descriptive Name of the Source	40 CFR 60 NSPS				40 CFR 61			40 CFR 63						40 CFR		
		A	Kb	Db	VV	A	F	V	A	F	G	H			64	68	82
There are no changes to applicable regulations with this permit modification application.																	

KEY TO MATRIX

- 1 (Applicable) The regulations have applicable requirements that apply to this particular emissions source. This includes any monitoring, recordkeeping, or reporting requirements.
- 2 (Exempt) The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
- 3 (Does Not Apply) The regulations do not apply to this emissions source. The regulations may have applicable requirements that could apply to this emissions source but the requirements do not currently apply to the source due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place.

Blank – The regulations clearly do not apply to this type of emission source.

TABLE 2: STATE AND FEDERAL AIR QUALITY REQUIREMENTS

For each Emission Point ID Number:

- List each regulation that applies.
- Arrange the requirements imposed by each regulation according to the headings provided below.
- Repeat this process for each regulation that applies to each source.
- State-only Requirements should be noted as such in the appropriate column.

[illegible]

TABLE 3: EXPLANATION FOR EXEMPTION STATUS OR NON-APPLICABILITY OF A SOURCE

Emission Point ID No:	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
<i>There are no changes to applicable requirements with this permit modification application.</i>				

The above table provides explanation for either the exemption status or non-applicability of a source cited by 2 or 3 in the matrix presented in Table 1 of this application.

TABLE 4: EQUIPMENT LIST

Enter each single emission point that routes its emissions to another source (i.e., a control device) or a common stack, or is part of an Emissions Cap. List the emissions source to which each single emission point is routed or the Cap of which the source is a member, if applicable. Consult instructions.

Emission Point ID No:	Description	Construction Date	Part of Emissions CAP:	Operating Rate/Volume	Applicable Requirement(s)?
<i>This table only lists CHANGES from current permit. RLP 0014, RLP 0013, and EQT 0186 are already part of GRP 0021; we are requesting to add EQT 0153 to the Group.</i>					
RLP 0014	Sulfuric Acid Unit 1, criteria pollutants only	1953	CAP-Comb (GRP 0021)	900 TPD Acid Produced	no new reqts
RLP 0013	Sulfuric Acid Unit 2, criteria pollutants only	1968	CAP-Comb (GRP 0021)	1900 TPD Acid Produced	no new reqts
EQT 0153	Package (ABCO) Boiler	1990	CAP-Comb (GRP 0021)	106 MMBTU/hr	no new reqts
EQT 0186	Rental (Holman) Boiler	2006	CAP-Comb (GRP 0021)	133 MMBTU/hr	no new reqts

23. Emissions Inventory Questionnaire (EIQ) Forms [LAC 33:III.517.D.3; 517.D.6]

Complete one (1) EIQ for:

- Each emission source. If two emission sources have a common stack, the applicant may submit one EIQ sheet for the common emissions point. Note any emissions sources that route to this common point in Table 4 of the application.
- Each emissions CAP that is proposed. In general, this applies to each source that is part of the CAP.
- Each alternate operating scenario that a source may operate under. Some common scenarios are:
 1. Sources that combust multiple fuels
 2. Sources that have Startup/Shutdown max lb/hr emission rates higher than the max lb/hr for normal operating conditions would need an EIQ for the Startup/Shutdown emission rates for those sources
- Fugitive emissions releases. One (1) EIQ should be completed for each of the following types of fugitive emissions sources or
 1. Equipment leaks.
 2. Non-equipment leaks (i.e. road dust, settling ponds, etc).

For each EIQ:

- Fill in all requested information.
- Speciate all Toxic Air Pollutants and Hazardous Air Pollutants emitted by the source.
- Use appropriate significant figures.
- Consult instructions.

The EIQ is in Microsoft Word Excel. Click on this link to get to the EIQ form.

<http://www.deq.louisiana.gov/portal/DIVISIONS/AirPermits/AirPermitApplications.aspx>

24. NSR Applicability Summary [LAC 33:III.504 and LAC 33:III.509]

■ N/A

This section consists of five tables, A-E, and is applicable only to new and existing major stationary sources (as defined in LAC 33:III.504 or in LAC 33:III.509) proposing to permit a physical change or change in the method of operation. It would also apply to existing minor stationary sources proposing a physical change or change in the method of operation where the change would be a major source in and of itself. Add rows to each table as necessary. Provide a written explanation of the information summarized in these tables. Consult instructions.

PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

Instructions: Complete this checklist and submit with the completed air permit application.

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit Application	Yes	No	NA	Location Within the Permit Application
517.A Timely Submittal	Was a Copy of the Application Also Submitted to EPA?	●	○	○	
517.B.1,2 Certification	Does the Application include a Certification by a Responsible Official?	●	○	○	AAE - Section 10
517.B.3 Certification	Does the Application Include Certification by a Professional Engineer or their Designee:	●	○	○	AAE - Section 10
517.D.1 Identifying Information	Does the Application Include:				
	1. Company Name, Physical and Mailing Address of Facility?	●	○	○	AAE - Section 2
	2. Map showing Location of the Facility?	●	○	○	Appendix A
	3. Owner and Operator Names and Agent?	●	○	○	AAE - Section 1
	4. Name and Telephone Number of Plant Manager or Contact?	●	○	○	AAE - Section 11
517.D.2 SIC Codes, Source Categories	Does the Application Include a Description of the Source's Processes and Products?	○	○	●	No change from current permit
	Does the Application Include the Source's SIC Code?	●	○	○	AAE - Section 5
	Does the Application Include EPA Source Category of HAPs if applicable?	○	○	●	
517.D.3,6 EIQ Sheets	Has an EIQ Sheet been Completed for each Emission Point whether an Area or Point Source?	●	○	○	AAE - Section 24
517.D.4 Monitoring Devices	Does the Application Include Identification and Description of Compliance Monitoring Devices or Activities?	○	●	○	No change from current permit
517.D.5 Revisions and Modifications Only	For Revisions or Modifications, Does the Application include a Description of the Proposed Change and any Resulting Change in Emissions?	●	○	○	AAE - Sections 2, 12, 24
517.D.7 General Information	Does the Application Include Information Regarding Fuels, Fuel Use, Raw Materials, Production Rates, and Operating Schedules as necessary to substantiate emission rates?	●	○	○	Appendix B
517.D.8 Operating Limitations	Has Information Regarding any Limitations on Source Operation or any Applicable Work Practice Standards been Identified?	○	○	●	No change from current permit
517.D.9 Calculations	Are Emission Calculations Provided?	●	○	○	Appendix B
517.D.10 Regulatory Review	Does the Application Include a Citation and Description of Applicable Louisiana and Federal Air Quality Requirements and Standards?	○	○	●	No change from current permit

PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit	Yes	No	N/A	Location Within the
517.D.11 Test Methods	Has a Description of or a Reference to Applicable Test Methods Used to Determine Compliance with Standards been Provided?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	No change from current permit
517.D.12 Major Sources of TAPs	Does the Application include Information Regarding the Compliance History of Sources Owned or Operated by the Applicant (per LAC 33.III.5111)?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.D.13 Major Sources of TAPs	Does the Application include a Demonstration to show that the Source Meets all Applicable MACT and Ambient Air Standard Requirements?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Appendix C
517.D.14 PSD Sources Only	If Required by DEQ, Does the Application Include Information Regarding the Ambient Air Impact for Criteria Pollutants as Required for the Source Impact Analysis per LAC 33:III.509.K,	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517 D.15 PSD Sources Only	If Required by DEQ, Does the Application Include a Detailed Ambient Air Analysis?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.D.16, 18	Has any Additional Information been Provided?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
517.D.17 Fees	Has the Fee Code been Identified?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 5
	Is the Applicable Fee Included with the Application?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	
517.E.1 Additional Part 70 Requirements	Does the Certification Statement Include a Description of the Compliance Status of Each Emission Point in the Source with All	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 10
517E.2 Additional Part 70 Requirements	Does the Certification Statement Include a Statement that the Source will continue to Comply with All Applicable	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 10
517.E.3 Additional Part 70 Requirements	Does the Certification Statement Include a Statement that the Source will, on a timely basis, meet All Applicable Requirements that will Become Effective During the Permit Term?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 10
517.E.4 Additional Part 70 Requirements	Are there Applicable Requirements for which the Source is not in Compliance at the Time of Submittal?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
	Does the Application include a Compliance Plan Schedule?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
	Does the Schedule Include Milestone Dates for which Significant Actions will occur?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
	Does the Schedule Include Submittal Dates for Certified Progress Reports?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.E.5 Additional Part 70 Requirements Acid Rain	Is this Source Covered by the Federal Acid Rain Program?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
	Are the Requirements of LAC 33.III.517.E 1-4 included in the Acid Rain Portion of the Compliance Plan?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	

PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit	Yes	No	N/A	Location Within the
517.E.6 Additional Part 70 Requirements	Have any Exemptions from any Applicable Requirements been Requested?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	No new exemption requests
	Is the List and explanations Provided?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.E.7 Additional Part 70 Requirements	Does the Application Include a Request for a Permit Shield?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	No new shield requested
	Does the Request List those Federally Applicable Requirements for which the Shield is Requested along with the Corresponding	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.E.8 Additional Part 70 Requirements	Does the Application Identify any Reasonably Anticipated Alternative Operating Scenarios?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
	Does the Application include Sufficient Information to Develop permit Terms and Conditions for Each Scenario, Including Source Process and Emissions Data?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.F Confidentiality	Does the Application Include a Request for Non-Disclosure (Confidentiality)?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
525.B. Minor Permit Modifications	Does the Application Include a Listing of New Requirements Resulting for the Change?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	No new requirements
	Does the Application Include Certification by the Responsible Official that the Proposed Action Fits the Definition of a Minor Modification as per LAC 33:III.525.A.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	cover letter
	Does the Certification also Request that Minor Modification Procedures be Used?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	cover letter
	Does the Application, for Part 70 Sources, Include the Owner's Suggested Draft Permit and Completed Forms for the Permitting Authority to Use to Notify Affected States?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
La. R.S. 30:2018 – PSD/NNSR only	Has a copy of the answers to the questions posed in the Environmental Assessment Statement (Section 25) been sent to	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
	Has a copy of the answers to the questions posed in the Environmental Assessment Statement (Section 25) been sent to the designated public library at no cost to the designated public	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	

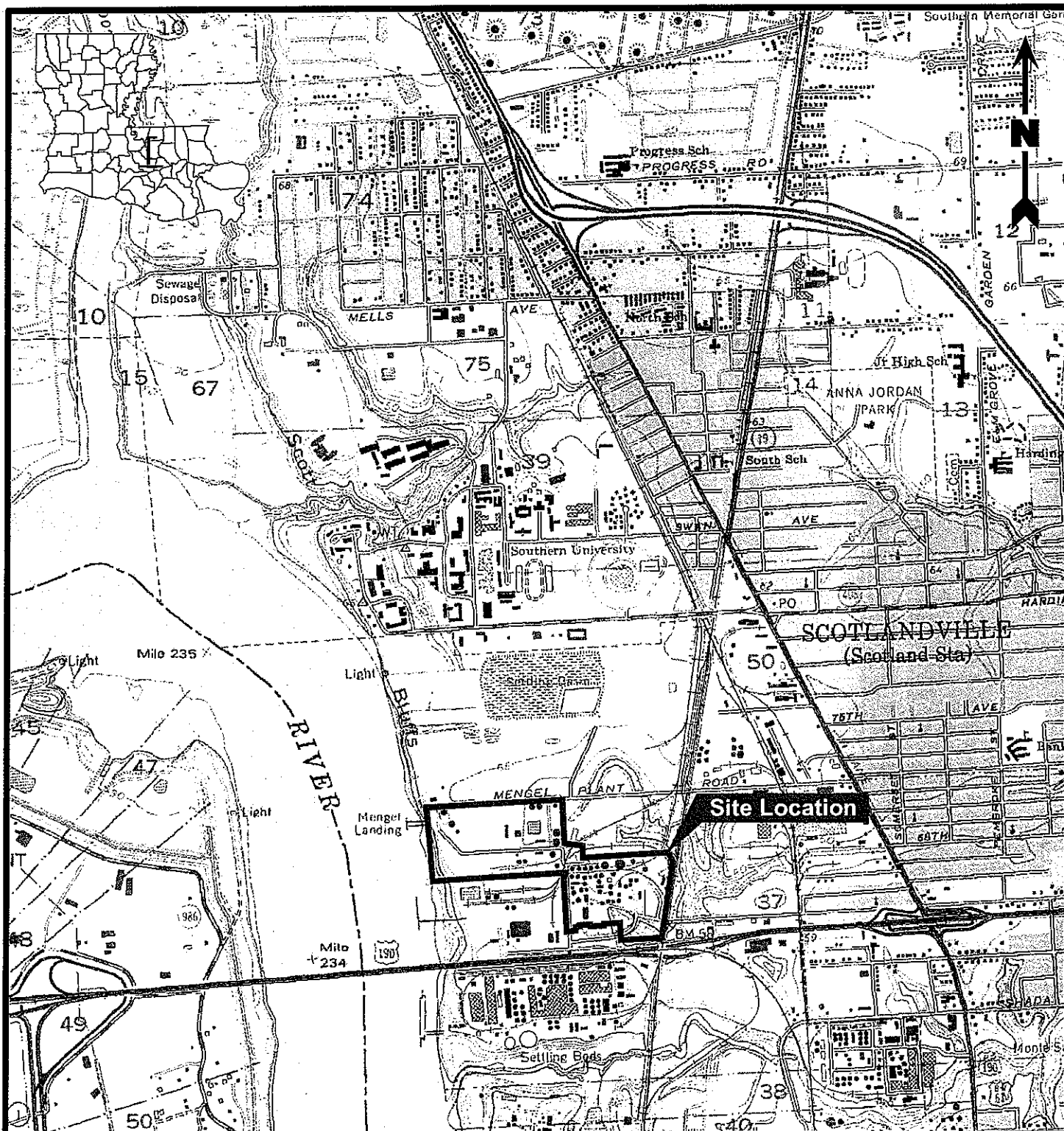
State of Louisiana										Date of Submittal	
Emissions Inventory Questionnaire (EIQ) for Air Pollutants										December 2011	
Emission Point ID No. (Alternate ID) 2		Descriptive Name of the Emissions Source (Alt. Name) Sulfuric Acid Unit 2				Approximate Location of Stack or Vent (see instructions) Method <u>28 - "GPS-Unspecified"</u> Datum <u>NAD 83</u> UTM Zone <u>15</u> Horizontal <u>674,224</u> mE Vertical <u>3,376,734</u> mN Latitude <u>30</u> degrees <u>30</u> min <u>37</u> sec <u>4</u> hundredths Longitude <u>-91</u> degrees <u>11</u> min <u>3</u> sec <u>75</u> hundredths					
TEMPO Subject Item ID No. RLP 0013											
Stack and Discharge Physical Characteristics Change? Yes	Diameter or Stack Discharge Area 4.50 ft NA ft²	Height of Stack Above Grade 130 ft	Stack Exit Velocity 113.9 ft/sec	Stack Gas Flow at Conditions, not at Standard 108,705 ft³/min	Stack Gas Exit Temperature 90 °F	Normal Operating Time (hours per year) 8760	Date of Construction or Modification	Percent of Annual Throughput through This Emission Point			
								Jan - Mar 25%	Apr - Jun 25%	Jul - Sep 25%	Oct - Dec 25%
Type of Fuel Used and Heat Input (see instructions)				Operating Parameters (include units)							
Fuel	Type of Fuel	Heat Input (MM Btu/hr)		Value/Parameter		Description					
a				Normal Operating Rate/Throughput		1900 tons/day		H2SO4 produced			
b				Maximum Operating Rate/Throughput		2280 tons/day		H2SO4 produced			
c				Design Capacity/Volume		2280 tons/day		H2SO4 produced			
Notes				Shell Height (ft)							
Annual rates are permitted via emissions caps CAP-Comb (GRP 0021) and CAP-SAU (GRP 0002). SO2 maximum emissions are regulated as 3-hr average.				Tank Diameter (ft)							
Roof Type											
Emission Point ID No. (Alternate ID) 2		Air Pollutant Specific Information									
Pollutant		Control Equipment Code	Control Equipment Efficiency	HAP/TAP CAS Number	Proposed Emission Rates			Permitted Emission Rate (tons/yr)	Add, Change, Delete, or Unchanged	Continuous Compliance Method	Concentration in Gases Exiting at Stack
					Average (lb/hr)	Maximum (lb/hr)	Annual (tons/yr)				
				N/A	23.75				U		
PM10				N/A	23.75				U		
SO2 Phase II and III				7446-09-5	NA				U		
NOx				N/A	134.56				U		
CO				630-08-0	74.61				U		
VOC Total				N/A	2.73				C		
Antimony (and compounds)				7440-36-0	0.671				U		
Arsenic (and compounds)				7440-38-2	0.001				U		
Barium (and compounds)				7440-39-3	1.313				U		
Beryllium (and compounds)				7440-41-7	0.001				U		
Cadmium (and compounds)				7440-43-9	0.001				U		
Chromium VI (and compounds)				7440-47-3	0.006				U		
Lead compounds				7439-92-1	0.12				U		
Mercury (and compounds)				7439-97-6	0.013				U		
Nickel (and compounds)				7440-02-0	0.006				U		
Selenium (and compounds)				7782-49-2	0.413				U		
Cobalt compounds				7440-48-4	0.17				U		
Copper (and compounds)				7440-50-8	0.632				U		
Manganese (and compounds)				7439-96-5	0.43				U		
Zinc (and compounds)				7440-66-6	1.24				U		
Hydrochloric acid				7647-01-0	2.12				U		
Chlorine				7782-50-5	0.57				C		
Sulfuric acid				7664-93-9	11.88				U		

State of Louisiana										Date of Submittal	
Emissions Inventory Questionnaire (EIQ) for Air Pollutants										December 2011	
Emission Point ID No. (Alternate ID) 3		Descriptive Name of the Emissions Source (Alt. Name) Sulfuric Acid Unit 1				Approximate Location of Stack or Vent (see instructions)					
TEMPO Subject Item ID No. RLP 0014						Method 28 - "GPS-Unspecified		Datum NAD 83			
						UTM Zone 15 Horizontal 673,942 mE		Vertical 3,376,695 mN			
						Latitude 30 degrees 30 min 35 sec 95 hundredths					
						Longitude -91 degrees 11 min 14 sec 34 hundredths					
Stack and Discharge Physical Characteristics Change? Yes	Diameter or Stack Discharge Area 3.00 ft NA ft²	Height of Stack Above Grade 130 ft	Stack Exit Velocity 118.1 ft/sec	Stack Gas Flow at Conditions, not at Standard 50,080 ft³/min	Stack Gas Exit Temperature 90 °F	Normal Operating Time (hours per year) 8760	Date of Construction or Modification	Percent of Annual Throughput through This Emission Point			
								Jan - Mar 25%	Apr - Jun 25%	Jul - Sep 25%	Oct - Dec 25%
Type of Fuel Used and Heat Input (see instructions)						Operating Parameters (include units)					
Fuel	Type of Fuel	Heat Input (MM Btu/hr)				Value/Parameter		Description			
a				Normal Operating Rate/Throughput		900 tons/day		H2SO4 produced			
b				Maximum Operating Rate/Throughput		1080 tons/day		H2SO4 produced			
c				Design Capacity/Volume		1080 tons/day		H2SO4 produced			
Notes				Shell Height (ft)							
Annual rates are permitted via emissions caps CAP-Comb (GRP 0021) and CAP-SAU (GRP 0002). In Phase III, SO2 maximum emissions will be regulated as 3-hr average.				Tank Diameter (ft)							
				Roof Type							
Emission Point ID No. (Alternate ID) 3		Air Pollutant Specific Information									
		Control Equipment Code	Control Equipment Efficiency	HAP/TAP CAS Number	Proposed Emission Rates			Permitted Emission Rate (tons/yr)	Add, Change, Delete, or Unchanged	Continuous Compliance Method	Concentration in Gases Exiting at Stack
Pollutant					Average (lb/hr)	Maximum (lb/hr)	Annual (tons/yr)				
PM ₁₀				N/A	11.25				U		
SO2 Phase II				7446-09-5	904.17				U		
SO2 Phase III				7446-09-5	NA				U		
NOx				N/A	63.27				U		
CO				630-08-0	44.26				U		
VOC Total				N/A	0.94				C		
Antimony (and compounds)				7440-36-0	0.466				U		
Arsenic (and compounds)				7440-38-2	0.004				U		
Barium (and compounds)				7440-39-3	0.778				U		
Beryllium (and compounds)				7440-41-7	<0.001				U		
Cadmium (and compounds)				7440-43-9	<0.001				U		
Chromium VI (and compounds)				7440-47-3	0.001				U		
Lead compounds				7439-92-1	0.08				U		
Mercury (and compounds)				7439-97-6	0.011				U		
Nickel (and compounds)				7440-02-0	0.003				U		
Selenium (and compounds)				7782-49-2	0.373				U		
Cobalt compounds				7440-48-4	0.10				U		
Copper (and compounds)				7440-50-8	0.379				U		
Manganese (and compounds)				7439-96-5	0.26				U		
Zinc (and compounds)				7440-66-6	0.75				U		
Hydrochloric acid				7647-01-0	14.87				U		
Chlorine				7782-50-5	0.21				C		
Sulfuric acid				7664-93-9	5.63				U		

[illegible]

[illegible]

Appendix A
Site Location Map



0 1,000 2,000 4,000
Feet

Site Location Map

East Baton Rouge Parish

Rhodia Inc.
Baton Rouge, Louisiana



PROVIDENCE
ENGINEERING & ENVIRONMENTAL GROUP LLC

Reference

Base map comprised of U.S.G.S. 7.5 minute topographic map, "Scotlandville, LA" dated 1963 revised 1994. Image is referenced to UTM NAD 83 Zone 15.

Doc. Code: 015-003

Drawn: LMH

Dwg. No.: 015-003-A020

Checked:

Approved:

Date: 02/02/05

1
Figure

Appendix B

Emission Calculations

Sulfuric Acid Unit 1 (RLP 0014) and Unit 2 (RLP 0013)

JBS
12/13/2011

Nameplate Capacity, TPD (after debottlenecking):

Unit 1 Total	900
Unit 2 Total	1900
Unit 2 Regen Furnace*	1200
Unit 2 Sulfur Furnace*	700

*Estimated split for purpose of emission calcs only, these are NOT limits.

Operating Schedule: 8760 hours

Emission Summary

	Unit 1 Maximum		Unit 2 Maximum		Unit 1 Annual ⁶		Unit 2 Annual ⁶	
	lbs/hr	Ref	lbs/hr	Ref	tpy	Ref	tpy	Ref
PM ₁₀ (filterable + sulfuric acid mist)	11.25	1b	23.75	1b	16.43	1a	34.68	1a
SO ₂ Phase II (current)	904.17	2a	NA	2b	3960.25	2a	762.85	2a
SO ₂ Phase III (after Unit 1 abated)	NA	2b	NA	2b	312.08	2a	762.85	2a
NOx	63.27	3b	134.56	3b	37.78	3a	54.20	3a
CO	44.26	4b	74.61	4b	9.86	4a	41.37	4a
Total VOC	0.94	5	2.73	5	3.44	5	9.95	5
hydrogen chloride	14.87	9a	2.12	9a	2.48	8	1.11	8
chlorine	0.21	9b	0.57	9b	0.45	8	1.25	8
sulfuric acid	5.63	7b	11.88	7b	13.47	7a	28.43	7a

References

1a	Annual/average post-abatement overall PM10 (filterable + sulfuric acid mist) emission factor conservatively assumed to be:				0.100	lbs/ton
1b	Maximum hourly post-abatement overall PM10 (filterable + sulfuric acid mist) emission factor conservatively assumed to be:				0.300	lbs/ton
2a	Unit 1 Phase II:	31.00 lbs SO ₂ per ton acid produced 700.00 TPD acid produced 3960.25 TPY 904.17 lbs/hr SO ₂	Unit 2:	2.20 lbs SO ₂ per ton acid produced 1900.00 TPD acid produced 762.85 TPY		
	Unit 1 Phase III:	1.90 lbs SO ₂ per ton acid produced 900.00 TPD acid produced 312.08 TPY				

References (cont.)

2b SO₂ is regulated on a 3-hour average basis.

3a Emission factors calc'd from test data

Unit 1: 0.23 lbs/ton
37.78 TPY

Unit 2: 0.23 lbs/ton, Regen furnace
0.03 lbs/ton, Sulfur furnace
54.20 TPY

3b Estimate as max result from Baytown facility (100 ppm):
Estimate max hourly production as 120% of nameplate.
To convert ppm to lbs/hr, use January 2002 stack test data, scaling up

Unit 1: 452 ton per day acid during test
48.6 max ppm from Jan 2002 test
12.87 max lbs/hr from Jan 2002 test
63.27 lbs/hr max

Unit 2: 1191 ton per day acid during test
33.12 max ppm from Jan 2002 test
23.28 max lbs/hr from Jan 2002 test
134.56 lbs/hr max

4a Calculate emission factor based on January 2002 stack test:

Unit 1: 452 ton per day acid during test
6.1 ppm max (Run 6)
1.13 lbs/hr max (Run 6)
0.060 lbs/ton emission factor from testing
9.86 TPY

Unit 2: 1191 ton per day acid during test
15.19 ppm max (Run 3)
5.92 lbs/hr max (Run 3)
0.119 lbs/ton emission factor from testing
41.37 TPY

4b Estimate as 100 ppm (RCRA limit)
Estimate max hourly production as 120% of nameplate.

Unit 1: 44.26 lbs/hr max

Unit 2: 74.61 lbs/hr max

5 Emission factors calc'd from test data (2003 Trial Burn, Table 9.9, Mode C)
Max emissions estimated as 120% of average.

Unit 1: 0.0209 lbs/ton
0.78 lbs/hr avg
0.94 lbs/hr max
3.44 TPY

Unit 2: 0.0287 lbs/ton
2.27 lbs/hr avg
2.73 lbs/hr max
9.95 TPY

6 Annual tpy is contribution to CAP-Comb or CAP-SAU

References (cont.)

7a For annual/average emissions, conservatively assume an overall emission factor for sulfuric acid mist of: 0.082 lbs/ton
This average/annual emission factor is for projected performance post-abatement. This factor is merely used to estimate total capped tpy emissions and is not intended to be a limit on its own. The only enforceable limit in terms of lbs/ton is the 0.15 lbs/ton limit per Subpart H.

7b For maximum emissions, use NSPS Subpart H limit: 0.150 lbs/ton

8 See below (note these are internal allocations used to estimate total, they are not limits):

	Unit 1	Unit 2	Total	Notes/Reference
total chlorides fed, lbs/yr	900,000	2,500,000		(TS + Spent + IFS + sulfur + Daphne vent); conservative estimate
% of "chlorides fed" emitted as HCl	0.55%	0.089%		conservative estimate based on test data
% of "chlorides fed" emitted as Cl ₂	0.10%	0.10%		conservative estimate based on test data
HCl emissions, lbs	4950	2225	7,175	
chlorine emissions, lbs	900	2500	3,400	

9a Estimate as 120% of max emission rates from November 2003 Trial Burn (all are Mode A, Run 2).

9b Estimate as twice the average rate b/c this is higher than 9a estimate.

CAP-SAU -- Cap on Sulfuric Acid Unit Emissions (Unit 1 and Unit 2)
For pollutants NOT included in Cap-Comb

JBS
11/15/2011

EMISSION SUMMARY

	Annual tpy		Annual TPY
	from Unit 1	from Unit 2	
hydrogen chloride	2.48	1.11	3.59
chlorine	0.45	1.25	1.70
sulfuric acid	13.47	28.43	41.90
Metals - see "Metals" tab			

CAP-Comb -- Cap on Combustion Emissions [Unit 1, Unit 2, Rental (Holman) Boiler, Package (ABCO) Boiler]

For pollutants NOT included in CAP-SARU (CAP-Comb includes typical natural gas combustion pollutants)

JBS

11/15/2011

Description

Units 1 and 2 are the primary steam-generating units for the site. The Holman and ABCO boilers provide supplemental and backup steam. All 4 units work together to provide steam for the site and an emissions cap is appropriate for overall combustion emissions.

Emission Summary

	Annual tpy				Average lbs/hr	Annual TPY
	from Unit 1	from Unit 2	from Holman	from ABCO		
PM ₁₀ (filterable + sulfuric acid mist)	16.43	34.68	*	2.63	12.27	53.73
SO ₂ Phase II (current)	3960.25	762.85	*	1.20	1078.61	4724.30
SO ₂ Phase III (after Unit 1 abated)	312.08	762.85	*	1.20	245.69	1076.13
NOx	37.78	54.20	*	17.52	25.00	109.50
CO	9.86	41.37	*	38.76	20.54	89.98
Total VOC	3.44	9.95	*	6.13	4.46	19.52

TS Vapor Combustor
EQ 21

JBS
11/15/2011

Description

The TS vapor combustor is the backup VOC control device for emissions that normally vent to the Unit 2 Regen furnace which are (a) TS storage tank emissions, (b) emissions from venting direct burn railcars after pressure unloading, and (c) emissions from venting direct burn trucks after unloading (rarely). Permitted emissions are conservatively estimated assuming year-round venting to TSVC.

Natural Gas, Max Fire

SCFM	183	1986 EQ Sheet
BTU/SCF	1040	
MMBTU/hr	11.4	
MMSCF/hr	0.011	

Vent Gas, Max:

lbs/hr	10.6	maximum inlet VOC test result to date (1-15-02 Run 2)
BTU/lb	21221	assume butane
MMBTU/hr	0.225	
TOTAL, MMBTU/hr, max	11.6	

EMISSION SUMMARY

	AP-42 Factor lbs/MMSCF ¹	TCEQ Factor lbs/MMBTU ²	John Zink Factor lbs/MMBTU ³	Average		Maximum		Annual TPY
				lbs/hr	Ref	lbs/hr	Ref	
PM ₁₀	7.6			0.08	4	0.08	4	0.37
CO	84	0.5496		0.92	4	6.40	5	4.04
NOx			0.60	0.88	6	6.99	7	3.85
SO ₂				0.06	8	0.28	9	0.25
HCl				0.08	12	0.52	12	0.36
chlorine				0.004	12	0.03	12	0.02
Total VOCs				0.21	10	0.28	11	0.92

References

1. AP-42 Section 1.4, Natural Gas Combustion, 7/98, Factors for Small Boilers (<100 MMBtu/hr).
2. From the TCEQ document —Air Permit Technical Guidance for Chemical Sources: Flares & Thermal Oxidizers - RG-109 (Draft) September 2000, for low BTU streams (<1000 BTU/SCF)
3. Factor provided by John Zink "typical high" for vapor combustors.
4. AP-42 Factor and max natural gas firing rate.
5. TCEQ Factor and max MMBTU/hr (natural gas + vent).
6. Average of June 2010 and March 2011 test results.
7. John Zink Factor and max MMBTU/hr (natural gas + vent).
8. Maximum stack test result to date (from Sept 2009, while unloading a barge).
9. Estimate as 5X the average.
10. Average of 3 test runs in Jan 2002.
11. Maximum stack test result to date (from Jan 2002).
12. Estimate as follows:

VOCs vented, max lbs/hr (max of all data on combustor inlet)	10.60
VOCs vented, avg lbs/hr (avg of all data on combustor inlet)	4.96
% of VOCs vented that are chlorinated organics, max	5.0%
% of VOCs vented that are chlorinated organics, average	1.7%
DRE of chlorinated organics	100%
% converted to HCl	95%
% converted to Cl ₂	5%

Description

The caustic scrubber (EIQ 13) and Acid Plant Vapor Combustor (APVC) operating in series are the backup control device for the spent acid storage tanks in the tankfarm (primary control device is Unit 1 furnace); other minor sources include the IFS Mix Tank, IFS railcar cleaning, and venting of railcars after they are pressure unloaded. The caustic scrubber provides SO₂ control and the APVC provides VOC control. As a backup to the Unit 1 furnace, the scrubber/APVC operate about 25% of the year. However, the pilot flame on the combustor is always lit. Thus, the operating schedule is shown as 52 weeks per year, but the majority of the emissions occur during 25% of the year.

Hours in Standby/Pilot:	6570	hours
Hours Controlling Emissions:	2190	hours
Natural Gas, Pilot		
SCFM	0.9	
MMSCF/hr	0.0001	
Natural Gas, Assist Gas		
SCFM	55	
BTU/SCF	1040	
MMBTU/hr	3.43	
MMSCF/hr	0.003	
Vent Gas, Max:		
lbs/hr	152.88	max from Dec 2001 test
BTU/lb	21221	assume butane
MMBTU/hr	3.24	
TOTAL MMBTU/hr when venting	6.68	
Overall avg MMBTU/hr	4.14	(weighted avg of pilot and venting time, for EIQ form)

Emission Summary:

	AP-42 Factor lbs/MMSCF ¹	John Zink Factor lbs/MMBTU ³	Avg When Venting (25%)		Avg in Pilot (75%)		Overall Avg lbs/hr	Maximum		Annual TPY
			lbs/hr	Ref	lbs/hr	Ref		lbs/hr	Ref	
PM ₁₀	7.6		0.03	4a	0.00041	4b	0.01	0.03	4a	0.03
CO	84		6.74	6	0.00454	4b	1.69	15.13	8	7.40
NOx	100	0.60	1.16	6	0.00540	4b	0.29	4.01	7	1.29
SO ₂	0.6		0.04	8	0.00003	4b	0.01	0.40	9	0.04
HCl			0.35	12			0.09	2.24	12	0.39
chlorine			0.02	12			0.005	0.11	12	0.02
Total VOC	5.5		1.78	8	0.00030	4b	0.45	7.64	10	1.95

References

- AP-42 Section 1.4, Natural Gas Combustion, 7/98, Factors for Small Boilers (<100 MMBtu/hr).
- Factor provided by John Zink "typical high" for vapor combustors.
- AP-42 Factor and max natural gas firing rate.
- AP-42 Factor and pilot natural gas firing rate.
- Average of June 2010 test results, 2 of the 4 runs were during barge unloading (max rates).
- John Zink Factor and max MMBTU/hr (natural gas + vent).
- Maximum stack test result to date (from Sept 2009, while unloading a barge).
- Estimate as 10X the average rate when venting.
- Apply 95% control to max uncontrolled VOC rate
- Estimate as follows:

VOCs vented, max lbs/hr (max of all data on combustor inlet)	152.88
VOCs vented, avg lbs/hr (avg of all data on combustor inlet)	72.59
% of VOCs vented that are chlorinated organics, max	1.50%
% of VOCs vented that are chlorinated organics, average	0.50%
DRE of chlorinated organics	100%
% converted to HCl	95%
% converted to Cl ₂	5%

Package Boiler (ABCO)
EQ 6-90

JBS
 11/15/2011

Op. Schedule = 8760 hrs per year
 Average heat input = 50 MMBtu/hr
 Maximum heat input = 106 MMBtu/hr
 Heating Value of Natural Gas = 1040 BTU/scf
 Molecular Weight of S = 32 lbs/lbmole
 Molecular Weight of SO₂ = 64 lbs/lbmole

Emission Summary

Pollutant	Basis	Sulfur Concentration (gr/100 scf)	Maximum Emissions (lbs/hr)	Annual Emissions ⁵ (tpy)
PM-10	1		1.27	2.63
Sulfur Dioxide	2	2	0.58	1.20
Nitrogen Oxides	3,4		21.20	17.52
Carbon Monoxide	1		18.76	38.76
VOCs	1		2.97	6.13

Notes:

¹ Max rate from the vendor, Gordon-Piatt Energy Group. Annual is max rate adjusted for firing rate.

² Based on the assumption of total conversion of S to SO₂.

³ Annual rate based on letter from the vendor G-P: 0.08 lb/MMBTU

⁴ Maximum (assume on short-term basis, could be 2X the NSPS Db 30-day rolling average limit) 0.20 lb/MMBTU

⁵ Annual tpy is contribution to Cap-Comb

Total Site-Wide TAPs/HAPsJBS
11/18/2011**Summary**

Rhodia is area source for HAPs (<25 TPY total HAPs, <10 TPY each HAP)

Rhodia is major source for TAPs (>10 TPY for sulfuric acid)

Rhodia exceeds MERs (based upon proposed permitted annual emissions) for:

sulfuric acid	antimony (and compounds)
HCl	arsenic (and compounds)
Cl ₂	barium (and compounds)
MIBK	chromium VI (and compounds)
	copper (and compounds)
	manganese (and compounds)
	nickel (and compounds)
	selenium (and compounds)
	zinc (and compounds)

Total HAPs (compare to 25 tpy)

Source - Permitted HAPs	Proposed Permit Limits (tpy)
Unit 1&2 (Cap-SAU) - HAP metals	0.404
Unit 1&2 (Cap-SAU) - HCl, Cl ₂	5.29
Sulfur Feed Tank- CS ₂	0.02
TS Vapor Combustor - HCl and Cl ₂	0.38
AP Vapor Combustor - HCl and Cl ₂	0.41
Gasoline Tank	0.06
TS Process - total TAPs	2.03
Spent Acid Process - total TAPs	0.59
CathyVal MIBK per V2 permit	9.46
CathyVal Other HAPs per V2 permit	5.07
CVAL GCXVII per V2 permit	0.34
Total Acid Plant	9.18
Total CVAL Plant	14.87
TOTAL Overall	24.05

Individual TAP/HAPs
 (compare to 10 tpy for HAPs)
 (compare to MERs for TAPs)

Source	Proposed Permit Limits (tpy) TAPs that are not HAPs				
	H ₂ SO ₄	H ₂ S	barium (and compounds)	copper (and compounds)	zinc (and compounds)
Unit 1&2 (Cap-SAU)	41.90	--	0.181	0.111	0.220
Sulfur Feed Tank	--	0.44	--	--	--
TS Vapor Combustor	--	--	--	--	--
AP Vapor Combustor	--	--	--	--	--
Gasoline Tank	--	--	--	--	--
Fug-Acid	0.46	--	--	--	--
Spent Acid Process	--	0.01	--	--	--
TS Process	--	0.04	--	--	--
Acid Plant GCXVII	0.13	--	--	--	--
CathyVal per V2 permit	--	--	--	--	--
CVAL GCXVII per V2 permit	--	--	--	--	--
TOTAL, tpy	42.49	0.49	0.18	0.11	0.22
TOTAL, lbs/yr	84,985	980	362	222	440
MER, lbs/yr	75	1000	37.5	25	200

TAPs/HAPs not listed in this table are permitted only in TS Process and Spent Acid Process.
 These limits were intentionally calculated to equal 95% of the MER.

Individual TAP/HAPs
(compare to 10 tpy for HAPs)
(compare to MERs for TAPs)

Source	Proposed Permit Limits (tpy) TAPs/HAPs													
	HCl	Cl ₂	CS ₂	antimony (and compounds)	arsenic (and compounds)	beryllium (and compounds)	cadmium (and compounds)	chromium VI (and compounds)	cobalt (and compounds)	lead compounds	manganese (and compounds)	mercury (and compounds)	nickel (and compounds)	selenium (and compounds)
Unit 1&2 (Cap-SAU)	3.59	1.70	--	0.032	0.022	0.012	0.012	0.030	0.03	0.08	0.080	0.012	0.038	0.056
Sulfur Feed Tank	--	--	0.02	--	--	--	--	--	--	--	--	--	--	--
TS Vapor Combustor	0.36	0.02	--	--	--	--	--	--	--	--	--	--	--	--
AP Vapor Combustor	0.39	0.02	--	--	--	--	--	--	--	--	--	--	--	--
Gasoline Tank	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Fug-Acid	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Spent Acid Process	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TS Process	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Acid Plant GCXVII	--	--	--	--	--	--	--	--	--	--	--	--	--	--
CathyVal per V2 permit	--	--	--	--	--	--	--	--	--	--	--	--	--	--
CVAL GCXVII per V2 permit	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TOTAL, tpy	4.34	1.74	0.02	0.03	0.02	0.01	0.01	0.03	0.03	0.08	0.08	0.01	0.04	0.06
TOTAL, lbs/yr	8,680	3,480	40	64	44	24	24	60	60	160	160	24	76	112
MER, lbs/yr	500	100	2400	37.5	25	25	25	25	sup	sup	75	25	25	25

TAPs/HAPs not listed in this table are permitted only in TS Process and Spent Acid Process.
These limits were intentionally calculated to equal 95% of the MER.

Individual TAP/HAPs
(compare to 10 tpy for HAPs)
(compare to MERs for TAPs)

Source	Proposed Permit Limits (tpy) TAPs/HAPs													
	MIBK	methanol	chloroethane	methyl chloride	phenol	hydroquinone	pyro- catechol	n-hexane	benzene	toluene	2,2,4- trimethyl pentane	ethyl- benzene	xylene	
Unit 1&2 (Cap-SAU)	--	--	--	--	--	--	--	--	--	--	--	--	--	
Sulfur Feed Tank	--	--	--	--	--	--	--	--	--	--	--	--	--	
TS Vapor Combustor	--	--	--	--	--	--	--	--	--	--	--	--	--	
AP Vapor Combustor	--	--	--	--	--	--	--	--	--	--	--	--	--	
Gasoline Tank	--	--	--	--	--	--	--	0.01	0.01	0.01	0.01	0.01	0.01	
Fug-Acid	--	--	--	--	--	--	--	--	--	--	--	--	--	
Spent Acid Process	0.01	0.50	0.50	0.39	0.01	0.50	0.50	0.50	0.01	0.50	0.50	0.50	0.50	
TS Process	0.01	0.50	0.50	0.50	0.10	0.50	0.50	0.50	0.10	0.50	0.50	0.50	0.50	
Acid Plant GCXVII	--	--	--	--	--	--	--	--	--	--	--	--	--	
Cathy/Val per V2 permit	9.46	3.38	0.12	0.23	0.52	0.36	0.46	--	--	--	--	--	--	
CVAL GCXVII per V2 permit	0.04	0.04	0.04	0.04	0.06	0.05	0.07	--	--	--	--	--	--	
TOTAL, tpy	9.48	4.38	1.12	1.12	0.63	1.36	1.46	1.01	0.12	1.01	1.01	1.01	1.01	
TOTAL, lbs/yr	18,960	8,760	2,240	2,240	1,260	2,720	2,920	2,020	240	2,020	2,020	2,020	2,020	
MER, lbs/yr	15,000	20,000	20,000	7750	1400	NA - sup	NA - sup	13,000	260	20,000	NA - sup	20,000	20,000	

TAPs/HAPs not listed in this table are permitted only in TS Process and Spent Acid Process.
These limits were intentionally calculated to equal 95% of the MER.

Appendix C

LA MACT Standards

MACT is required for Class I and II TAPs that are permitted site-wide above their respective minimum emission rates (MERs). The application does not propose to change any emission rates of class I or II TAPs, thus no new MACT determinations are needed. Additionally, there is no change to the existing MACT determinations with this permit application.

LA Ambient Air Standards

This permit application proposes to modify emission rates for the Class III TAPs hydrochloric acid and chlorine. See below for a comparison of previously modeled emissions and results along with current and proposed emission rates.

EIQ ID	EQT ID	Source	Modeled lbs/hr	Permitted Max lbs/hr	Ambient Air Standard (µg/m3)	Model Result (µg/m3) ¹
Chlorine						
3	RLP 0014	Unit No. 1	0.2103	0.20 (V3) 0.21 (V4 prop)	35.7	26.71
2	RLP 0013	Unit No. 2		0.05 (V3) 0.57 (V4 prop)		
21	EQT 0147	TS Vapor Combustor	0.5063	0.10 (V3) 0.03 (V4 prop)		
27	EQT 0151	Acid Plant Vapor Combustor	0.5492	0.54 (V3) 0.11 (V4 prop)		
Hydrochloric Acid						
3	RLP 0014	Unit No. 1	14.1587	14.87 (V3) 14.87 (V4 prop)	180	134.82
2	RLP 0013	Unit No. 2		2.12 (V3) 2.12 (V4 prop)		
21	EQT 0147	TS Vapor Combustor	0.5206	0.42 (V3) 0.52 (V4 prop)		
27	EQT 0151	Acid Plant Vapor Combustor	2.9762	2.20 (V3) 2.24 (V4 prop)		

“V3” is the max hourly rate in the current permit (number 0840-00033-V3 issued 5-11-11). “V4” is the proposed rate per this permit application. Modeling was conducted (Providence, March 2005) for the initial Title V permit (number 0840-00033-V0). As shown above, emission rates have been revised/reconciled between the time of the March 2005 modeling and the current/proposed permit. These revisions are not expected to negatively impact the results because the vapor combustors have a disproportionately higher impact on predicted offsite concentrations (due to lower stack heights and velocities) than Units No. 1 and No. 2 and the vapor combustors proposed permitted emission rates are less than or equal to the modeled emissions. Rhodia will update the modeling to validate this supposition and forward the results to LDEQ upon request.

¹ Refined modeling for year 2003, includes offsite sources.

BOBBY JINDAL
GOVERNOR



AFS 11 000 450 100

PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

LA 100
V.6

Certified Mail No.: 7006 0810 0003 0354 7105

Activity No.: 20100009
Agency Interest No. 1314

Mr. Daniel Tate
Plant Manager
Rhodia, Inc.
P.O. Box 828
Baton Rouge, Louisiana 70821-0828

RE: Part 70 Permit Modification, Rhodia, Inc. - Sulfuric Acid Plant - Baton Rouge Facility, Baton Rouge, East Baton Rouge Parish, Louisiana

Dear Mr. Tate:

This is to inform you that the permit modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the 11 of May, 2016, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and Agency Interest No. cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this 11 day of May, 2011.

Permit No.: 0840-00033-V3

Sincerely,

Sam L. Phillips
Assistant Secretary
SLP:dhb
c: US EPA Region VN

RECEIVED - 6PDL
AIR PLANNING SEC.
11 MAY 23 PM 3:34

Schizothorax sinensis (Steindachner)

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Sulfuric Acid Plant - Baton Rouge Facility
Rhodia, Inc.
Agency Interest No.: 1314; PER20100009
Baton Rouge, East Baton Rouge Parish, Louisiana

I. Background

Rhodia Inc. (Rhodia) operates a Sulfuric Acid Plant located in Baton Rouge, East Baton Rouge Parish, Louisiana. The facility produces sulfuric acid by using two sulfuric acid production trains (Unit No. 1 and Unit No. 2). Unit No. 1 was constructed in 1953 and unit No. 2 was constructed in 1968. Previously the facility operated under Title V Permit 0840-00032-V0 dated October 12, 2005 and Title V General Permit No. 3032-V1 issued December 13, 2006. Currently the facility operates under a consolidated Title V Permit 0840-00032-V2 dated November 30, 2009.

Rhodia has entered into a Consent Decree (Civil Action No. 2:07CV134 WL) with the United States and various State parties including Louisiana, effective July 23, 2007. This Consent Decree requires Rhodia to install controls for SO₂ emissions at their various plant sites nation wide. The requirements for the Baton Rouge Facility have been incorporated into this permit.

II. Origin

An air permit application and Emission Inventory Questionnaire (EIQs) were submitted by Rhodia, Inc. on September 16, 2010 requesting a Part 70 operating permit major modification.

III. Description

Sulfuric Acid Plant

Rhodia receives spent sulfuric acid and hazardous waste fuels from off-site sources and recovers the sulfur and energy values in its industrial furnaces, forming fresh sulfuric acid. The sulfuric acid production process begins with treatment of the feed streams in the industrial furnace. Liquids are sprayed using atomizers into the combustion chamber. Normal operating conditions are 2% to 4% excess furnace oxygen and furnace temperature between 1800°F and 2200°F at the furnace discharge. Furnace residence time is approximately three seconds. The feed streams are producing steam for process use. Gas from the waste heat boiler is further cooled and cleaned in the gas scrubbing system. This system includes spray scrubbing and wet electrostatic precipitators to remove acid mist and particulate emissions.

Cooling systems reduce the gas temperature from 600°F to 100°F. The wet gas is then dried through counter-current packed flow columns circulating ≥93% sulfuric acid. Dry gas is heated to 800°F before the sulfur dioxide is converted to sulfur trioxide using catalyst. Because the conversion step to sulfur trioxide is exothermic, the hot exhaust gas is used to heat up the incoming feed by cross-current heat exchange.

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Sulfur trioxide from the converter enters a countercurrent packed absorption tower. Strong sulfuric acid absorbs and hydrolyzes the sulfur trioxide to sulfuric acid. The demisters are the final pollution control device, removing primarily sulfuric acid mist generated in the acid tower. The demisters also control HCl and particulate emissions.

The preceding process description pertains to Unit No. 1. The Unit No. 2 process is slightly different. After the drying step, the gas enters a second sulfur burning furnace, followed by a hot gas filter. This added step heats the gas, affording a second occasion for combustion. Unit No. 2 has over twice the capacity of Unit No. 1. Equipment is sized proportionately, with Unit No. 2 having a longer residence time.

Waste Storage

Seven tanks have been constructed specifically for the storage of hazardous waste. These seven tanks are located in the truck and rail unloading facility and operate under a nitrogen pad. A positive pressure vent system is tied into Unit No. 2 or to the TS Vapor Combustor to burn all fumes and vapors.

Package Boiler

The package boiler provides backup and supplemental steam production to Units No. 1 and No. 2. It is rated for 80,000 lbs/hr steam production with a heat input of 106 MMBtu/hr and is permitted for an annual average heat input of 50 MMBtu/hr. It is fired with natural gas only and is equipped with low-NOx burners and a continuous flue gas oxygen analyzer.

Rental Boiler

The rental boiler provides backup steam production to Units No. 1 and No. 2 and the package boiler. It is fired with natural gas only and has a maximum firing rate of 133 MMBtu/hr but is limited to a calendar average firing rate of 12.4 MMBtu/hr per 40 CFR 60.44b(j)(2).

SO₂ Abatement Scrubbers and Debottlenecking Project

As part of Rhodia's consent decree for the Baton Rouge facility, Rhodia will install packed bed scrubbers on Sulfuric Acid Unit No. 1 and Unit No. 2 to control SO₂ emissions, which will be reduced by more than 10,000 TPY by the completion of Phase III of the project. Also as part of the consent decree, the Environmental Protection Agency (EPA) agreed to allow the Sulfuric Acid Plant to undergo an expansion project. This project will allow the facility to increase its total Sulfuric Acid (H₂SO₄) production from 2,200 tons/day to 2,800 tons/day. Specifically, the capacity of Sulfuric Acid Unit No.1 (EPN 3) will increase from 700 tons/day to 900 tons/day of sulfuric acid, and the capacity of Sulfuric Acid Unit No. 2 (EPN 2) will increase from 1,500

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tons/day to 1,900 tons/day. The capacity increase will be accomplished with a series of debottlenecking projects.

Proposed Changes

Rhodia is requesting the following changes with this permit modification.

1. Reinstate the 10% annual capacity limit for the Rental (Holman) Boiler (EQT0186). While the Package Boiler (EQT0153) was out for repairs in March 2010 – September 2010, the Rental Boiler was used for supplying backup steam production for Unit 2, which required the Rental Boiler to exceed the 10% annual capacity limit. Now that the ABCO boiler is back in service, the Rental Boiler will resume running at the 10% annual capacity factor.
2. Remove three LAC 33:III.501.C.6 requirements for the Rental (Holman) Boiler (EQT0186) because the requirements are already covered by 40 CFR 60 Subpart Db or LAC 33:III.509.R.6.
3. Modify the applicable NSPS Subpart Db requirements for the Package (ABCO) Boiler (EQT0153) to address the addition of a NO_x analyzer. The requirements will go into effect once the NO_x analyzer is installed.
4. Revise the maximum lbs/hr limit for NO_x on the Package (ABCO) Boiler (EQT0153) to allow for normal variation in short-term emissions.
5. Reconcile emissions of PM₁₀ from the cooling towers (EQT0154 & EQT0155) using an accurate measurement of total dissolved solids (TDS) and an updated drift factor. In the previous permit, a measurement of total suspended solids (TSS) was mistaken for TDS by Rhodia's in-house lab. Rhodia also changed the drift factor used in the PM₁₀ emission calculations from the AP-42 factor to one provided by the vendor.
6. Reconcile emissions from the gasoline tank (EQT152) using updated input parameters in the TANKS 4.09 program.
7. Add the Diesel Fire Water Pump 20G961 (EQT291) along with 40 CFR 63 Subpart ZZZZ requirements for the engine.
8. Update the General Condition XVII Activities and the Insignificant Activities.
9. Replace the specific requirement for weekly pump inspections in the Treatments Services Fugitive Emissions (FUG0003) with the appropriate requirement for dual-mechanical seal pumps.
10. Update the UTM coordinates for the Treatment Services Sumps (ARE0003).
11. Replace LAC 33:III.Chapter 15 requirements for RLP0013 & RLP0014 with 40 CFR 60 Subpart H requirements in order to incorporate the Consent Decree signed by the EPA and LDEQ on July 23, 2007.

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Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	54.52*	58.16*	+3.64
SO ₂ (Phase II)	4725.98	4726.08	+0.10
SO ₂ (Phase III)	1077.79	1077.89	+0.10
NO _x	115.58	117.13	+1.55
CO	95.43	95.76	+0.33
VOC	26.16	26.55	+0.39

*Includes sulfuric acid mist

Phase II is effective from January 1, 2011 through April 30, 2012.

Phase III becomes effective on May 1, 2012.

Total HAP emissions are capped under 8.92 TPY.

For a list of VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs) and its respective emission rates in tons per year see the TPOR0146 report – Emission Rates For TAP/HAP & Other Pollutants.

IV. Type Of Review

This application was reviewed for compliance with the Louisiana Part 70 operating permit program, Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD) and Nonattainment New Source Review (NNSR) do not apply.

This facility is a major source of criteria pollutants. The facility is also a major source of Toxic Air Pollutants (TAPs) under LAC 33:III.Chapter 51. The facility is not a major source of Hazardous Air pollutants (HAPs); however, wastewater and wastewater residuals from facilities subject to 40 CFR 63 Subpart G and other MACT standards or NSPS may be treated at the facility. Therefore, the Sulfuric Acid Plant complies with any applicable provisions of these MACT/NSPS standards.

The modification is significant and requires LDEQ and EPA review. The starting date of the five-year permit duration is being established as per LAC 33:III.507.E.2.

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Permit Shield

Per 40 CFR 70.6(f) and LAC 33:III.507.I, a permit shield has been determined for the referenced facility as follows:

1. Per 40 CFR 60.8(c), emissions in excess of a standard are not in violation during startup, shutdown, or malfunction events. Further, per 40 CFR 60.11(c), the opacity standards do not apply during periods of startup, shutdown, and malfunction. Rhodia's Consent Decree defines startup as, "the 24-hour period at any sulfuric acid plant beginning when the feed of sulfur or sulfur-bearing materials, excluding conventional fossil fuels such as natural gas or fuel oils, to the furnace commences after a main gas blower shutdown" but there is no such definition in 40 CFR 60 Subpart H. Therefore, Rhodia has requested a permit shield to use the Consent Decree definition of "startup" for determining compliance with the 40 CFR 60 Subpart H 10% opacity limit and the 0.15 lbs/ton limit.
2. The Unit No. 1 and Unit No. 2 furnaces are treatment processes for certain waste streams regulated under 40 CFR 61 Subpart FF (Benzene Waste NESHAP). Per 40 CFR 61.348(e) certain requirements apply if the treatment process has any openings (e.g., access doors, hatches, etc.)

The furnaces operate at less than atmospheric pressure which is continuously monitored. Annual inspections per 61.348(e)(3)(ii) are conducted. Frequent inspections and repairs are conducted to minimize any cracks and unsealed openings. Very small openings may go undetected and/or not be repaired because the furnaces operate under vacuum. Occasionally, the furnaces may experience a short-term positive pressure when introducing a new feed to the furnace. This issue was reviewed with LDEQ for the recently issued BIF permit. The BIF permit requires that furnace pressure be maintained at -0.1 inches of water maximum, 10-second delay. The 10-second delay is allowed to normalize the pressure before automatically shutting down feeds to the furnace.

Rhodia requested a permit shield that allows compliance with 61.348(e) to be demonstrated by maintaining furnace pressure at -0.1 inches of water maximum, 10-second delay and operating furnace openings with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 61.355(h).

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3. For the Treatment Services Fugitive Emissions (EIQ FUG-TS), per the Louisiana Fugitive Emissions Program Consolidation Guidelines, Rhodia follows a streamlined fugitive monitoring program with the Louisiana MACT Determination for Non-HON sources as the most stringent program. Rhodia has reduced site-wide permitted emissions of all class I and II TAPs emitted from source FUG-TS to below their MERs. Thus, LA Non-HON MACT no longer applies. However, Rhodia is voluntarily choosing to continue to comply with the LA Non-HON MACT since the program is already in place. Therefore, Rhodia is requesting a permit shield to ensure that voluntarily complying with LA Non-HON MACT still ensures compliance with the underlying programs that were consolidated (40 CFR 264 Subpart BB and 40 CFR 61 Subpart V).
4. Rhodia requested a permit shield stating that compliance with the NSPS Subpart H acid mist and opacity standards constitutes compliance with the LAC 33:III.Chapter 15 acid mist standard and the LAC 33:III.1311.C opacity standard and that compliance with the SO₂ standard in the permit (long-term and short-term limits which are lower than the Subpart H standard of 4.0 lbs/ton) constitutes compliance with the LAC 33:III.Chapter 15 SO₂ standard. "Standard" in this context includes all monitoring, recordkeeping, reporting, and testing. This permit shield is effective upon permit issuance for Unit 2 for all three pollutants and for Unit 1 for acid mist. It becomes effective for Unit 1 SO₂ and opacity when the more stringent standards become effective on May 1, 2012

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

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VI. Public Notice

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on March 23, 2011. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on March 21, 2011. The draft permit was also submitted to US EPA Region VI on March 23, 2011. No comments were received.

VII. Effects on Ambient Air

Emissions associated with the proposed facility were reviewed by the LDEQ Air Permits Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions for this permit modification. However, LDEQ did require modeling for the 0840-00033-V2 permit, which the facility submitted on October 6, 2008. The results are presented below.

Dispersion Model(s) Used: ISCT3

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
Chlorine	8-Hour	26.71 $\mu\text{g}/\text{m}^3$	35.7 $\mu\text{g}/\text{m}^3$
Hydrochloric acid	8-Hour	134.82 $\mu\text{g}/\text{m}^3$	180.0 $\mu\text{g}/\text{m}^3$
Sulfuric acid	8-Hour	22.32 $\mu\text{g}/\text{m}^3$ *	23.8 $\mu\text{g}/\text{m}^3$
MIBK	8-Hour	323.02 $\mu\text{g}/\text{m}^3$	4880 $\mu\text{g}/\text{m}^3$
Antimony	8-Hour	0.466 $\mu\text{g}/\text{m}^3$	11.90 $\mu\text{g}/\text{m}^3$
Arsenic	Annual	0.00004 $\mu\text{g}/\text{m}^3$	0.02 $\mu\text{g}/\text{m}^3$
Barium	8-Hour	0.884 $\mu\text{g}/\text{m}^3$	11.90 $\mu\text{g}/\text{m}^3$
Chromium VI	Annual	0.00004 $\mu\text{g}/\text{m}^3$	0.01 $\mu\text{g}/\text{m}^3$
Copper	8-Hour	0.40913 $\mu\text{g}/\text{m}^3$	23.80 $\mu\text{g}/\text{m}^3$
Manganese	8-Hour	0.27827 $\mu\text{g}/\text{m}^3$	4.76 $\mu\text{g}/\text{m}^3$
Nickel	Annual	0.00004 $\mu\text{g}/\text{m}^3$	0.21 $\mu\text{g}/\text{m}^3$
Selenium	8-Hour	0.35001 $\mu\text{g}/\text{m}^3$	4.76 $\mu\text{g}/\text{m}^3$
Zinc	8-Hour	0.80561 $\mu\text{g}/\text{m}^3$	119.00 $\mu\text{g}/\text{m}^3$

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Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
SO ₂ *	Annual	21.88 µg/m ³	(80 µg/m ³)
	24-Hour	335.04 µg/m ³	(365 µg/m ³)
	3-Hour	1017.57 µg/m ³	(1300 µg/m ³)
*Phase I emissions (worst case)			

VIII. General Condition XVII

ID No.	Work Activity	Schedule	Emission Rates – tons					
			PM ₁₀	SO ₂	NO _x	CO	VOC	Other
GC1	Catalyst reconditioned in Sulfuric Acid Unit Nos. 1 & 2	Once each 24 months per unit	0.2					
GC2	Drum re-packaging	4 times per year					0.002	
GC3	Vacuum trucks used for tank cleanouts, spill cleanup, and sump clean out	Weekly					0.06	
GC4	Tank and process equipment cleaning						0.90	
GC5	Opening of truck and railcars containing waste fuel and spend acid for sampling, inspection, maintenance, or further processing	Daily					0.02	
GC6	Sampling waste fuel trucks and railcars via sample tap	10 times per day					0.01	##
GC7	Sampling spent acid and IFS trucks, railcars, and barges	8 times per day					0.004	
GC8	Washing inside surface of Unit No. 1 & 2 exhaust stacks	4 each Unit/Yr			1.33			0.03*
GC9	Odor-neutralizing compounds						0.06	
GC10	Manual gauging of tank levels						0.002	
GC11	Melting sulfur solidified in piping and other equipment at the old sulfur pit (formerly EIQ 18)			<0.001				<0.001 [#]

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ID No.	Work Activity	Schedule	Emission Rates – tons					Other
			PM ₁₀	SO ₂	NO _x	CO	VOC	
GC12	Sampling for moisture content, stack gauging, and pressure readings from gas streams			0.1				0.1*
GC13	Loading fresh acid onto heel of spent acid			0.003			0.004	
GC14	Acid Plant Vapor Combustor (APVC) routine maintenance	96 hours per year (max)					3.25	**
GC15	Unloading containers of spent acid with small percentage of chlorinated VOCs	1 per week		0.50			0.06	**

*Sulfuric Acid Mist

#Hydrogen Sulfide

**VOC Speciation similar to Spent Acid Process permitted emissions

##VOC Speciation similar to TS Process permitted emissions

IX. Insignificant Activities

ID No.	Description	Operating Rate	Regulation
		(Max) or Tank Capacity	
20D962	Diesel Storage Tank, Firewater Pump	300 gal	LAC 33:III.501.B.5.A.3
90D360	Diesel Storage Tank, Maintenance	1000 gal	LAC 33:III.501.B.5.A.3
	Diesel Storage Tank, IFS	1000 gal	LAC 33:III.501.B.5.A.3
91D321	IFS Wash-water Storage Tank	9000 gal	LAC 33:III.501.B.5.A.3
90D210	Laboratory Excess Sample Tank	100 gal	LAC 33:III.501.B.5.A.2
Hoods	Different Analyses*	N/A	LAC 33:III.501.B.5.A.6
	Drum Washing Operations	55 gal	LAC 33:III.501.B.5.A.7

*Vents associated with exhaust hoods for laboratory equipment used exclusively for routine chemical and physical analysis with the purpose of quality control or environmental monitoring purposes.

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X. Applicable Louisiana and Federal Air Quality Requirements																				
ID No.:	Description	LAC 33:III.Chapter																		
		5 [▲]	9	11	13	15	1701	2103	2107	2108	2111	2113	2115	2121	2122	2147	2153	51*	56	59*
UNF002	Facility Wide	1	1	1	1							1						1	1	1
ARE002	M4 - West End Sump																			
ARE003	M3 - Treatment Services Sumps																			
EQT008	30D260 - Spent Acid Tank							2												
EQT140	10 - Preheater; Acid Unit No. 1			1	1	2														
EQT141	11 - Lime Silos				1															
EQT142	12 - Oleum Loading Vent Scrubber	1																1		
EQT146	20 - Sulfur Feed Tank					2														
EQT147	21 - TS Vapor Combustor			1	1	2		1										1		
EQT149	24 - Oleum Barge Loading Scrubber	1																1		
EQT150	26 - Spent Acid Barge Loading Scrubber	1								3			2							
EQT151	27 - Acid Plant Vapor Combustor			1	1	2		2										1		
EQT152	28 - Gasoline Storage Tank							1												
EQT153	6-90 - Package Boiler			1	1	2														
EQT154	M1a - Unit 2 Cooling Tower				2															
EQT155	M1b - Unit 1 Cooling Tower				2															
EQT285	20D380 - Unit 2 Weak Acid Tank																			
EQT157	30D030 - Oleum Tank																			
EQT158	30D040 - 93/Oleum																			
EQT159	30D050 - 99WW Tank																			
EQT161	30D070 - Spent Acid Tank							2												
EQT163	30D100 - Spent Acid Tank							2												
EQT164	30D110 - Spent Acid Tank							2												
EQT165	30D120 - Spent Acid Tank							2												
EQT166	30D130 - Oleum Tank																			

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		5▲	9	11	13	15	1701	2103	2107	2108	2111	2113	2115	2121	2122	2147	2153	51*	56	59*
EQT167	30D140 – 99/Oleum/Spent							2												
EQT168	30D150 – 99/Oleum Spent							2												
EQT169	30D160 – Spent Acid Tank							2												
EQT170	30D180 – 93E Tank																			
EQT171	30D190 – Spent Acid Tank							2												
EQT173	30D210 – 93E Tank																			
EQT174	30D220 – 99WW Tank																			
EQT175	30D230 – 99C Tank																			
EQT176	20D120/30D240 – IFS Mix Tank							1												
EQT177	40D250 – Treatment Services Tank							1												
EQT178	40D280 – Treatment Services Tank							1												
EQT179	40D290 – Treatment Services Tank							1												
EQT180	40D200 – Treatment Services Tank							1												
EQT181	40D210 – Treatment Services Tank							1												
EQT182	40D300 – Treatment Services Tank							1												
EQT183	40D220 – Treatment Services Tank							1												
EQT184	30D103 – Sulfur Unloading Tank																			
EQT185	M7 – 001 Wastewater Treatment Unit																			
EQT186	1-06 – Rental Boiler	1		1	1	2														
FUG002	FUG-ACID – Acid Plant Fugitive Emissions					2									3			1		
FUG003	FUG-TS – Treatment Services Fugitive Emissions														3			1		
GRP002	CAP-SAU – Sulfuric Acid Units 1 & 2	1																		
GRP021	CAP-Comb - Combustion (Unit 1, Unit 2, Rental Boiler)	1																		
RLP013	2 – Sulfuric Acid Unit No. 2	1			1	1												1		
RLP014	3 – Sulfuric Acid Unit No. 1	1			1	1												1		

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		5 [▲]	9	11	13	15	1701	2103	2107	2108	2111	2113	2115	2121	2122	2147	2153	51*	56	59*
PCS001	Spt-Proc - Spent Acid Process																	1		
PCS002	TS-Proc - TS Process																	1		
EQT277	13 - Acid Plant Caustic Scrubber	1	1			1														
EQT278	U1-Scbr - Unit 1 Tail Gas Scrubber		1																	
EQT279	U2-Scbr - Unit 2 Tail Gas Scrubber		1																	
EQT280	U1-Furn - Unit 1 Furnace			1				2										1		
EQT281	U2-RFurn - Unit 2 Regen Furnace			1				1												
EQT282	U2-SFurn - Unit 2 Sulfur Furnace			1																
EQT283	U1-Proc - Unit 1 Process					1														
EQT284	U2-Proc - Unit 2 Process					1														
EQT291	M10 - Diesel Fire-water Pump			1	1															

* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
 - The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
 - 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
 - 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
- Blank - The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Sulfuric Acid Plant - Baton Rouge Facility

Rhodia, Inc.

Agency Interest No.: 1314; PER20100009

Baton Rouge, East Baton Rouge Parish, Louisiana

X. Applicable Louisiana and Federal Air Quality Requirements																															
ID No.:	Description	40 CFR 60								40 CFR 61					40 CFR 63										40 CFR 65			40 CFR 68			40 CFR 264
		A	Cd	Db	H	K	Ka	Kb	A	J	M	V	FF	A	DD	EEE	F	G*	GGG*	Q	XX*	ZZZZ	A	C	G	64	68	82	BB		
UNF002	Facility Wide	1							1		1		1	1	3			1	1		1							1	1		
ARE002	M4 – West End Sump																														
ARE003	M3 – Treatment Services Sumps																														
EQT008	30D260 – Spent Acid Tank							1																1	1						
EQT140	10 – Preheater; Acid Unit No. 1																														
EQT141	11 – Lime Silos																														
EQT142	12 – Oleum Loading Vent Scrubber																														
EQT146	20 – Sulfur Feed Tank																														
EQT147	21 – TS Vapor Combustor							1				1					1														
EQT149	24 – Oleum Barge Loading Scrubber																														
EQT150	26 – Spent Acid Barge Loading Scrubber																														
EQT151	27 – Acid Plant Vapor Combustor																						1		1						
EQT152	28 – Gasoline Storage Tank							3																							
EQT153	6-90 – Package Boiler			1																											
EQT154	M1a – Unit 2 Cooling Tower																				3										
EQT155	M1b – Unit 1 Cooling Tower																				3										
EQT285	20D380 – Unit 2 Weak Acid Tank					3	3	3																							
EQT157	30D030 – Oleum Tank					3	3	3																							
EQT158	30D040 – 93/Oleum					3	3	3																							
EQT159	30D050 – 99WW Tank					3	3	3																							
EQT161	30D070 – Spent Acid Tank					3	3	1																1	1						
EQT163	30D100 – Spent Acid Tank					3	3	1																1	1						
EQT164	30D110 – Spent Acid Tank					3	3	1																1	1						
EQT165	30D120 – Spent Acid Tank					3	3	1																1	1						
EQT166	30D130 – Oleum Tank					3	3	3																							
EQT167	30D140 – 99/Oleum/Spent					3	3	1																1	1						

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Sulfuric Acid Plant - Baton Rouge Facility
Rhodia, Inc.
Agency Interest No.: 1314; PER20100009
Baton Rouge, East Baton Rouge Parish, Louisiana

X. Applicable Louisiana and Federal Air Quality Requirements																													
ID No.:	Description	40 CFR 60							40 CFR 61					40 CFR 63									40 CFR 65			40 CFR			40 CFR 264
		A	Cd	Db	H	K	Ka	Kb	A	J	M	V	FF	A	DD	EEE	F	G*	GGG*	Q	XX*	ZZZZ	A	C	G	64	68	82	BB
EQT168	30D150 – 99/Oleum Spent					3	3	1																1	1				
EQT169	30D160 – Spent Acid Tank					3	3	1																1	1				
EQT170	30D180 – 93E Tank					3	3	3																					
EQT171	30D190 – Spent Acid Tank					3	3	1																					
EQT173	30D210 – 93E Tank					3	3	3																1	1				
EQT174	30D220 – 99WW Tank					3	3	3																					
EQT175	30D230 – 99C Tank					3	3	3																					
EQT176	20D120/30D240 – IFS Mix Tank							3																					
EQT177	40D250 – Treatment Services Tank					3	3	1					1					1											
EQT178	40D280 – Treatment Services Tank					3	3	1					1					1											
EQT179	40D290 – Treatment Services Tank					3	3	3					1					1											
EQT180	40D200 – Treatment Services Tank					3	3	1					1					1											
EQT181	40D210 – Treatment Services Tank					3	3	3					1					1											
EQT182	40D300 – Treatment Services Tank					3	3	3					1					1											
EQT183	40D220 – Treatment Services Tank					3	3	3					1					1											
EQT184	30D103 – Sulfur Unloading Tank												1					1											
EQT185	M7 – 001 Wastewater Treatment Unit							3																					
EQT186	1-06 – Rental Boiler			1																									
FUG002	FUG-ACID – Acid Plant Fugitive Emissions																								1				
FUG003	FUG-TS – Treatment Services Fugitive Emissions							1		1		1	1					1											1
GRP002	CAP-SAU – Sulfuric Acid Units 1 & 2																												
GRP021	CAP-Comb - Combustion (Unit 1, Unit 2, Rental Boiler)																												
RLP013	2 – Sulfuric Acid Unit No. 2	1	1		1 [#]													3								1			
RLP014	3 – Sulfuric Acid Unit No. 1	1	1		1 [#]													3								1			

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Sulfuric Acid Plant - Baton Rouge Facility

Rhodia, Inc.

Agency Interest No.: 1314; PER20100009

Baton Rouge, East Baton Rouge Parish, Louisiana

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60								40 CFR 61					40 CFR 63										40 CFR 65			40 CFR			40 CFR 264
		A	Cd	Db	H	K	Ka	Kb	A	J	M	V	FF	A	DD	EEE	F	G*	GGG*	Q	XX*	ZZZZ	A	C	G	64	68	82	BB		
PCS001	Spt-Proc - Spent Acid Process																														
PCS002	TS-Proc - TS Process																														
EQT277	I3 – Acid Plant Caustic Scrubber																														
EQT278	U1-Scbr – Unit 1 Tail Gas Scrubber																														
EQT279	U2-Scbr – Unit 2 Tail Gas Scrubber																														
EQT280	U1-Furn – Unit 1 Furnace												1					1							1						
EQT281	U2-RFurn – Unit 2 Regen Furnace												1					1													
EQT282	U2-SFurn – Unit 2 Sulfur Furnace																														
EQT283	U1-Proc – Unit 1 Process																														
EQT284	U2-Proc – Unit 2 Process																														
EQT291	M10 – Diesel Fire-water Pump																					1									

*Although a minor source of Hazardous Air Pollutants, the facility is required to comply with the applicable requirements of 40 CFR 63 Subpart G, Subpart GGG, and Subpart XX for streams regulated under these subparts if/when required notice is received from the generator(s) of the regulated material.

#40 CFR 60 Subpart H requirements are being phased in at different times for RLP013 (January 1, 2011) & RLP014 (May 1, 2012).

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
- Blank - The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Sulfuric Acid Plant - Baton Rouge Facility

Rhodia, Inc.

Agency Interest No.: 1314; PER20100009

Baton Rouge, East Baton Rouge Parish, Louisiana

XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
UNF002 Facility Wide	40 CFR 63 Subpart DD – National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations 40 CFR 63.680(a)	DOES NOT APPLY – Facility is a minor source of emissions of HAPs.
EQT140, 146, 147, 151, 153, 186, and FUG002 (10, 20, 21, 27, 6-90, 1-06, and FUG-ACID)	Emission Standards for Sulfur Dioxide LAC 33:III.1503	EXEMPT - units emit less than 250 TPY of sulfur compounds measured as SO ₂ . LAC 33:III.1503.C
EQT150 26 – Spent Acid Barge Loading Scrubber	Control of Emissions of Organic Compounds – Marine Vapor Recovery LAC 33:III. 2108	DOES NOT APPLY – Uncontrolled emissions are less than 100 tpy of VOCs. LAC 33:III.2108.A
	Control of Emissions of Organic Compounds – Waste Gas Disposal LAC 33:III.2115	EXEMPT – Waste gas stream has a combined weight of VOCs equal to or less than 100 pounds in any continuous 24 hour period. LAC 33:III.2115.H.1.c
EQT 151 27 – Acid Plant Vapor Combustor	Control of Emission of Organic Compounds LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.
EQT152 28 – Gasoline Storage Tank	NSPS Subpart Kb – Standards of Performance for Storage Vessels for Petroleum Liquids 40 CFR 60.110b	DOES NOT APPLY – Storage capacity is less than 73 m ³ 40 CFR 60.110b

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Sulfuric Acid Plant - Baton Rouge Facility

Rhodia, Inc.

Agency Interest No.: 1314; PER20100009

Baton Rouge, East Baton Rouge Parish, Louisiana

XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
EQT154 and 155 M1a and M1b Cooling Towers	Emission Standards for Particulate Matter LAC 33:III.1311.C	EXEMPT – LDEQ has granted an exemption from the opacity standards of LAC 33:III.1311.C as the particulate matter emissions are well below the process rate limitation. LAC 33:III.1311.E
	40 CFR 63 Subpart Q – National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers 40 CFR 63.400	DOES NOT APPLY – The Baton Rouge site does not use chromium-based water treatment chemicals. 40 CFR 63.400(a)
EQT008 Spent Sulfuric Acid Storage Tank	Control of Emission of Organic Compounds LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.
EQTs 161, 163-165, 167- 169, 171 Spent Acid Tanks	40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 40 CFR 60.110	DOES NOT APPLY – These tanks do not store petroleum liquids.
	40 CFR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984 40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.
	Control of Emission of Organic Compounds LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Sulfuric Acid Plant - Baton Rouge Facility

Rhodia, Inc.

Agency Interest No.: 1314; PER20100009

Baton Rouge, East Baton Rouge Parish, Louisiana

XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
EQT176 20D120/30D340 – IFS Mix Tank	40 CFR 60 Subpart Kb – Standards of Performance for Storage Volatile Organic Liquid Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 40 CFR 60.110(b)	DOES NOT APPLY – This tank is greater than 75 m ³ and less than 151 m ³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa. 40 CFR 60.110b(b)
CRG001 (EQTs 177, 178, 180) Tanks	40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 40 CFR 60.110	DOES NOT APPLY – These tanks do not store petroleum liquids.
	40 CFR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984 40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.
	LAC 33:III.2103.B – Storage of Volatile Organic Compounds	EXEMPT – Tanks at the Baton Rouge Rhodia, Inc. facility used for the storage of corrosive materials are not required to meet the submerged fill pipe provisions of subsections A and B of LAC 33:III.2103 per LAC 33:III.2103.G.7.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Sulfuric Acid Plant - Baton Rouge Facility

Rhodia, Inc.

Agency Interest No.: 1314; PER20100009

Baton Rouge, East Baton Rouge Parish, Louisiana

XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
EQTs 179, 181-183 Tanks	40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 40 CFR 60.110	DOES NOT APPLY – These tanks do not store petroleum liquids.
	40 CFR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984 40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.
	40 CFR 60 Subpart Kb – Standards of Performance for Storage Volatile Organic Liquid Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 40 CFR 60.110(b)	DOES NOT APPLY – These vessels have a capacity less than 75 m ³ . 40 CFR 60.110(b)(a)
EQT157 – 159, 162, 166, 170, 173 -175, 285 Tanks	40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 40 CFR 60.110	DOES NOT APPLY – These tanks do not store petroleum liquids.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Sulfuric Acid Plant - Baton Rouge Facility

Rhodia, Inc.

Agency Interest No.: 1314; PER20100009

Baton Rouge, East Baton Rouge Parish, Louisiana

XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
EQT157 – 159, 162, 166, 170, 173 -175, 285 Tanks (cont'd)	40 CFR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984 40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.
	40 CFR 60 Subpart Kb – Standards of Performance for Storage Volatile Organic Liquid Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 40 CFR 60.110(b)	DOES NOT APPLY – These tanks do not store VOLs.
EQT280 Unit 1 Furnace	Control of Emission of Organic Compounds LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.
FUG002 FUG-ACID	Fugitive Emission Control for Ozone Nonattainment Areas LAC 33:III.2122	DOES NOT APPLY – This facility does not meet the applicability criteria of LAC 33:III.2122.A.1. It is not a SOCM facility per LAC 33:III.Chapter 21.Appendix A.
	Emission Control and Reduction Requirements and Standards LAC 33:III.5109.A	DOES NOT APPLY – This source does not emit any class I or class II TAPs for which site-wide permitted emissions are over the MER. LAC 33:III.5109.A
FUG003 FUG-TS	Fugitive Emission Control for Ozone Nonattainment Areas LAC 33:III.2122	DOES NOT APPLY – This facility does not meet the applicability criteria of LAC 33:III.2122.A.1. It is not a SOCM facility per LAC 33:III.Chapter 21.Appendix A.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Sulfuric Acid Plant - Baton Rouge Facility

Rhodia, Inc.

Agency Interest No.: 1314; PER20100009

Baton Rouge, East Baton Rouge Parish, Louisiana

XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
RLP013 Sulfuric Acid Unit 2	40 CFR 63 Subpart G – National Emission Standards for Organic Hazardous Air Pollutants From the SOCMIs for Process Vents, Storage Vessels, Transfer Operations, and Wastewater 40 CFR 63.138(h)(2)(i)	EXEMPT – Per 40 CFR 63.138(h), this unit is exempt from the design evaluation or performance test requirements of 40 CFR 63.138(a)(3) and 40 CFR 63.138(j), and from the monitoring requirements of 40 CFR 63.132(a)(2)(iii), and from the associated recordkeeping and reporting requirements. 40 CFR 63.138(h)
	40 CFR 63 Subpart EEE – National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors 40 CFR 63.1200	DOES NOT APPLY – Facility is not subject to this subpart because the Unit 1 and 2 furnaces are not hazardous waste combustors as defined in the subpart. The Unit 1 and 2 furnaces are BIF facilities, not incinerators.
	Emission Standards for Sulfur Dioxide LAC 33:III Chapter 15	EXEMPT – Rhodia complies with LAC 33:III.Chapter 15 by complying with the more stringent requirements set forth in the Consent Decree and 40 CFR 60 Subpart H.
RLP014 Sulfuric Acid Unit 1	40 CFR 63 Subpart G – National Emission Standards for Organic Hazardous Air Pollutants From the SOCMIs for Process Vents, Storage Vessels, Transfer Operations, and Wastewater 40 CFR 63.138(h)(2)(i)	EXEMPT – Per 40 CFR 63.138(h), this unit is exempt from the design evaluation or performance test requirements of 40 CFR 63.138(a)(3) and 40 CFR 63.138(j), and from the monitoring requirements of 40 CFR 63.132(a)(2)(iii), and from the associated recordkeeping and reporting requirements. 40 CFR 63.138(h)

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Sulfuric Acid Plant - Baton Rouge Facility

Rhodia, Inc.

Agency Interest No.: 1314; PER20100009

Baton Rouge, East Baton Rouge Parish, Louisiana

XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
RLP014 Sulfuric Acid Unit 1 (cont'd)	40 CFR 63 Subpart EEE – National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors 40 CFR 63.1200	DOES NOT APPLY – Facility is not subject to this subpart because the Unit 1 and 2 furnaces are not hazardous waste combustors as defined in the subpart. The Unit 1 and 2 furnaces are BIF facilities, not incinerators.
	Emission Standards for Sulfur Dioxide LAC 33:III Chapter 15	EXEMPT starting on May 1, 2012 – Rhodia complies with LAC 33:III Chapter 15 by complying with the more stringent requirements set forth in the Consent Decree and 40 CFR 60 Subpart H.

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Sulfuric Acid Plant - Baton Rouge Facility

Rhodia, Inc.

Agency Interest No.: 1314; PER20100009

Baton Rouge, East Baton Rouge Parish, Louisiana

Permittee shall comply with a streamlined equipment leaks monitoring program. Compliance with the streamlined program in accordance with this specific condition shall serve to comply with each of the applicable fugitive emission monitoring programs being streamlined, as indicated in the following table. Noncompliance with the streamlined program in accordance with this specific condition may subject the permittee to enforcement action for one or more of the applicable fugitive emissions programs.

- a. Permittee shall apply the streamlined program to the combined universe of components subject to any of the programs being streamlined. Any component type which does not require periodic monitoring under the overall most stringent program (LA MACT for Refineries) shall be monitored as required by the most stringent requirements of any other program being streamlined and will not be exempted. The streamlined program will include any exemptions based on size of component available in any of the programs being streamlined.
- b. Permittee shall use leak definitions and monitoring frequency based on the overall most stringent program. Percent leaker performance shall be calculated using the provisions of the overall most stringent program. Annual monitoring shall be defined as once every four quarters. Some allowance may be made in the first year of the streamlined program in order to allow for transition from existing monitoring schedules.
- c. Permittee shall comply with recordkeeping and reporting requirements of the overall most stringent program. Semiannual reports shall be submitted on September 30 and March 31, to cover the periods January 1 through June 30 and July 1 through December 31, respectively. The semiannual reports shall include any monitoring performed within the reporting period.

Unit or Plant Site	Programs Being Streamlined	Stream Applicability	Overall Most Stringent Program
Sulfuric Acid Plant	LAC 33:III.Chapter 51, LA MACT Determination for non-HON	≥ 5% VOTAP	LA MACT Determination for non-HON
	40 CFR 61 Subpart V, National Emission Standards for Equipment Leaks (Fugitive Emission Sources)	≥ 5% VOHAP	
	40 CFR 264 Subpart BB, RCRA Subpart BB	≥ 10% Organic	

General Information
AI ID: 1314 Rhodia Inc
Activity Number: PER20100009
Permit Number: 0840-00033-V3
Air - Title V Regular Permit Major Mod

Also Known As:

ID	Name	User Group	Start Date
0840-00033	Rhodia Inc	CDS Number	08-05-2002
LAD008161234	Rhodia Inc	Hazardous Waste Notification	11-17-1980
PMT/PC	GPRA Baselines	Hazardous Waste Permitting	10-01-1997
00861	Rhone Poulenc Basic Chemical Co	Inactive & Abandoned Sites	11-23-1999
LAD008161234	Stauffer Chemical Co Baton Rouge	Inactive & Abandoned Sites	11-23-1999
LA0005223	LPDES #	LPDES Permit #	05-22-2003
	Priority 1 Emergency Site	Priority 1 Emergency Site	07-18-2006
GL-349	Radiation General License	Radiation License Number	12-14-2000
LA-338A-N01	Radioactive Material License	Radiation License Number	12-14-2000
G-033-3198	Site ID #	Solid Waste Facility No.	11-21-1999
22318	Rhone Poulenc Basic Chemical Co Baton Rouge	TEMPO Merge	01-07-2002
38329	Stauffer Chemical	TEMPO Merge	11-19-2001
38427	Rhodia Inc	TEMPO Merge	01-11-2001
70821STFFRAIRLI	TRI #	Toxic Release Inventory	07-19-2004

Physical Location:

1275 Airline Hwy
Baton Rouge, LA 70805

Main FAX: 2253593722
Main Phone: 2253593481

Mailing Address:

1275 Airline Hwy
Baton Rouge, LA 70805

Location of Front Gate:

30.509861 latitude, -91.18465 longitude, Coordinate Method: Lat./Long. - DMS, Coordinate Datum: NAD83

Related People:

Name	Mailing Address	Phone (Type)	Relationship
S. B. "Bala" Balachandran	PO Box 828 Baton Rouge, LA 708210828	2253593443 (WF)	Accident Prevention Contact for
S. B. "Bala" Balachandran	PO Box 828 Baton Rouge, LA 708210828	2253593742 (WP)	Accident Prevention Contact for
Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Radiation Contact For
Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Radiation License Billing Party for
Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Water Billing Party for
Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Haz. Waste Billing Party for
J. Marcus Lewis	PO Box 828 Baton Rouge, LA 708210828	2253567111 (WP)	Responsible Official for
John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Air Permit Contact For
John Richardson	PO Box 828 Baton Rouge, LA 70821	JOHN.RICHARDSOI	Air Permit Contact For
John Richardson	PO Box 828 Baton Rouge, LA 70821	JOHN.RICHARDSOI	Accident Prevention Billing Party for
John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Accident Prevention Billing Party for
John Richardson	PO Box 828 Baton Rouge, LA 70821	JOHN.RICHARDSOI	Emission Inventory Facility Contact for
John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Emission Inventory Facility Contact for

General Information

AI ID: 1314 Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Related Organizations:	Name	Address	Phone (Type)	Relationship
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Air Billing Party for
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Operates
	Rhodia Inc	c/o CT Corporation System Baton Rouge, LA 70808		Agent of Service for
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Emission Inventory Billing Party
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Owns

NAIC Codes: 325188, All Other Basic Inorganic Chemical Manufacturing

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Ms. Tommie Milam, Permit Support Services Division, at (225) 219-3259 or email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Spent Acid Process						
ARE 0002	M4 - West End Sump			55 gallons/mo	55 gallons/mo oil skimmed from sump	8760 hr/yr
EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank	950000 gallons				8760 hr/yr
EQT 0150	26 - Spent Acid Barge Loading Scrubber		800 gallons/min	28.4 MM gallons/yr		1664 hr/yr
EQT 0151	27 - Acid Plant Vapor Combustor		1161 gallons/min	728000 tons/yr	Operating rates shown are spent acid receipts. Control device-vapor combustor (95% eff. VOC).	8760 hr/yr
EQT 0161	30D070 - Spent Acid Tank	125655 gallons				8760 hr/yr
EQT 0163	30D100 - Spent Acid Tank	227869 gallons				8760 hr/yr
EQT 0164	30D110 - Spent Acid Tank	227869 gallons				8760 hr/yr
EQT 0165	30D120 - Spent Acid Tank	227869 gallons				8760 hr/yr
EQT 0167	30D140 - 99/Oleum/Spent	331612 gallons			Insignificant when storing Product Sulfuric Acid	8760 hr/yr
EQT 0168	30D150 - 99/Oleum/Spent	285198 gallons			Insignificant when storing Product Sulfuric Acid	8760 hr/yr
EQT 0169	30D160 - Spent Acid Tank	285900 gallons				8760 hr/yr
EQT 0171	30D190 - Spent Acid Tank	285318 gallons				8760 hr/yr
EQT 0176	20D120/30D240 - IFS Mix Tank	25000 gallons				8760 hr/yr
EQT 0185	M7 - 001 Wastewater Treatment Unit			330000 gallons/day		8760 hr/yr
EQT 0277	13 - Acid Plant Caustic Scrubber			315 gallons/min	The control device is a scrubber (99% eff. SO2). Works in series with EIQ 27.	2190 hr/yr
FUG 0002	FUG-ACID - Acid Plant Fugitive Emissions					8760 hr/yr

INVENTORIES

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
TS Process						
ARE 0003	M3 - Treatment Services Sumps			2500 gallons/day		8760 hr/yr
EQT 0147	21 - TS Vapor Combustor		8 MM BTU/hr	3 MM BTU/hr	Previously Identified as Emergency Flare Stack	8760 hr/yr
EQT 0177	40D250 - Treatment Services Tank	157000 gallons				8760 hr/yr
EQT 0178	40D280 - Treatment Services Tank	47000 gallons				8760 hr/yr
EQT 0179	40D290 - Treatment Services Tank	12000 gallons				8760 hr/yr
EQT 0180	40D200 - Treatment Services Tank	47000 gallons				8760 hr/yr
EQT 0181	40D210 - Treatment Services Tank	12000 gallons				8760 hr/yr
EQT 0182	40D300 - Treatment Services Tank	8000 gallons				8760 hr/yr
EQT 0183	40D220 - Treatment Services Tank	8000 gallons				8760 hr/yr
EQT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber			900 tons/day		8760 hr/yr
EQT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber			1900 tons/day		8760 hr/yr
EQT 0280	U1-Furn - Unit 1 Furnace			900 tons/day		8760 hr/yr
EQT 0281	U2-RFurn - Unit 2 Regen Furnace			1200 tons/day		8760 hr/yr
EQT 0282	U2-SFurn - Unit 2 Sulfur Furnace			700 tons/day		8760 hr/yr
EQT 0283	U1-Proc - Unit 1 Process			900 tons/day		8760 hr/yr
EQT 0284	U2-Proc - Unit 2 Process			1900 tons/day		8760 hr/yr
FUG 0003	FUG-TS - Treatment Services Fugitive Emissions					8760 hr/yr
RLP 0013	2 - Sulfuric Acid Unit No. 2		2280 tons/day	1900 tons/day		8760 hr/yr
RLP 0014	3 - Sulfuric Acid Unit No. 1		1080 tons/day	900 tons/day		8760 hr/yr

INVENTORIES

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Facility Wide						
EQT 0140	10 - Preheater; Acit Unit No. 1		6 MM BTU/hr	6 MM BTU/hr	This stack is equipped with a rain cap. A negligible velocity is used in modeling analyses.	8760 hr/yr
EQT 0141	11 - Lime Silos		22.5 tons/hr	135 Tons lime/year	Out of service,	6 hr/yr
EQT 0142	12 - Oleum Loading Vent Scrubber		150 gallons/min	2,664 MM gallons/yr		672 hr/yr
EQT 0146	20 - Sulfur Feed Tank	84460 gallons	110 gallons/min	44.6 MM gallons/yr	This stack is equipped with a rain cap. A negligible velocity is used in modeling analyses.	8760 hr/yr
EQT 0149	24 - Oleum Barge Loading Scrubber		600 gallons/min	12.96 MM gallons/yr		400 hr/yr
EQT 0152	28 - Gasoline Storage Tank	1000 gallons	10000 gallons/yr	10000 gallons/yr		8760 hr/yr
EQT 0153	6-90 - Package Boiler		106 MM BTU/hr	50 MM BTU/hr		8760 hr/yr
EQT 0154	M1a - Unit 2 Cooling Tower			36000 gallons/min		8760 hr/yr
EQT 0155	M1b - Unit 1 Cooling Tower			16000 gallons/min		8760 hr/yr
EQT 0157	30D030 - Oleum Tank	158605 gallons				8760 hr/yr
EQT 0158	30D040 - 93/Oleum	158605 gallons			Insignificant when storing Product Sulfuric Acid	8760 hr/yr
EQT 0159	30D050 - 99WW Tank	158605 gallons			Out of Service; Insignificant when storing Product Sulfuric Acid	8760 hr/yr
EQT 0166	30D130 - Oleum Tank	331612 gallons				8760 hr/yr
EQT 0170	30D180 - 93E Tank	285247 gallons			Insignificant when storing Product Sulfuric Acid	8760 hr/yr
EQT 0173	30D210 - 93E Tank	406414 gallons			Insignificant when storing Product Sulfuric Acid	8760 hr/yr
EQT 0174	30D220 - 99WW Tank	406356 gallons			Insignificant when storing Product Sulfuric Acid	8760 hr/yr
EQT 0175	30D230 - 99C Tank	1.65 million gallons			Insignificant when storing Product Sulfuric Acid	8760 hr/yr
EQT 0184	20D103 - Sulfur Unloading Tank	150 gallons				8760 hr/yr
EQT 0186	1-06 - Rental Boiler		133 MM BTU/hr	133 MM BTU/hr		8760 hr/yr
EQT 0285	20D380 - Unit 2 Weak Acid Tank	21000 gallons			Insignificant Activity per LAC 33:III.501.B.5.D	8760 hr/yr
EQT 0291	M10 - Diesel Fire-Water Pump		200 horsepower	200 horsepower		500 hr/yr

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Spent Acid Process							
ARE 0002	M4 - West End Sump						72
EQT 0150	26 - Spent Acid Barge Loading Scrubber	27.81	1000	.87		13	120

INVENTORIES

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Spent Acid Process							
EQT 0151	27 - Acid Plant Vapor Combustor	2	2400	5		35	1350
EQT 0185	M7 - 001 Wastewater Treatment Unit						72
FUG 0002	FUG-ACID - Acid Plant Fugitive Emissions						72
TS Process							
ARE 0003	M3 - Treatment Services Sumps						72
EQT 0147	21 - TS Vapor Combustor	4	6786	6		50	1000
FUG 0003	FUG-TS - Treatment Services Fugitive Emissions						72
RLP 0013	2 - Sulfuric Acid Unit No. 2	113	107980	4.5		130	90
RLP 0014	3 - Sulfuric Acid Unit No. 1	119	50640	3		130	90
Facility Wide							
EQT 0140	10 - Preheater; Acid Unit No. 1	69	13006	2		38	1200
EQT 0141	11 - Lime Silos	6.7	250	.89		55	100
EQT 0142	12 - Oleum Loading Vent Scrubber	4.4	51.84	.5		15	100
EQT 0146	20 - Sulfur Feed Tank	2.7	183.22	1.2		30	284
EQT 0149	24 - Oleum Barge Loading Scrubber	19.7	100	.33		13	72
EQT 0152	28 - Gasoline Storage Tank	0	.02	.33		5	72
EQT 0153	6-90 - Package Boiler	25	14000	3.5		60	850
EQT 0154	M1a - Unit 2 Cooling Tower	25.6	945476	28		46	89
EQT 0155	M1b - Unit 1 Cooling Tower	27.9	526811	20		46	89
EQT 0186	1-06 - Rental Boiler	15.4	22000	5.5		20	470
EQT 0291	M10 - Diesel Fire-Water Pump	6.5	76.8	.5		9.25	355

Relationships:

ID	Description	Relationship	ID	Description
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0157	30D030 - Oleum Tank
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0158	30D040 - 93/Oleum
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0166	30D130 - Oleum Tank
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0182	40D300 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0181	40D210 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0180	40D200 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0179	40D290 - Treatment Services Tank

INVENTORIES

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

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Air - Title V Regular Permit Major Mod

Relationships:

ID	Description	Relationship	ID	Description
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0178	40D280 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0177	40D250 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0183	40D220 - Treatment Services Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0161	30D070 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0163	30D100 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0164	30D110 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0165	30D120 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0169	30D160 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0171	30D190 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0176	20D120/30D240 - IFS Mix Tank
EQT 0184	20D103 - Sulfur Unloading Tank	Vents to	EQT 0146	20 - Sulfur Feed Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0164	30D110 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0163	30D100 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0161	30D070 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Vents to	EQT 0151	27 - Acid Plant Vapor Combustor
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0165	30D120 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0176	20D120/30D240 - IFS Mix Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0171	30D190 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0169	30D160 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
EQT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber	Vents to	RLP 0014	3 - Sulfuric Acid Unit No. 1
EQT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber	Controls emissions from	EQT 0283	U1-Proc - Unit 1 Process
EQT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber	Controls emissions from	EQT 0284	U2-Proc - Unit 2 Process
EQT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber	Vents to	RLP 0013	2 - Sulfuric Acid Unit No. 2
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0165	30D120 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0164	30D110 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0163	30D100 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0161	30D070 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank

INVENTORIES

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

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Relationships:

ID	Description	Relationship	ID	Description
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0169	30D160 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0176	20D120/30D240 - IFS Mix Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0171	30D190 - Spent Acid Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0182	40D300 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0178	40D280 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0179	40D290 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0180	40D200 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0177	40D250 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0183	40D220 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0181	40D210 - Treatment Services Tank
EQT 0283	U1-Proc - Unit 1 Process	Controls emissions from	EQT 0280	U1-Furn - Unit 1 Furnace
EQT 0284	U2-Proc - Unit 2 Process	Controls emissions from	EQT 0282	U2-SFurn - Unit 2 Sulfur Furnace
EQT 0284	U2-Proc - Unit 2 Process	Controls emissions from	EQT 0281	U2-RFurn - Unit 2 Regen Furnace

Subject Item Groups:

ID	Group Type	Group Description
CRG 0001	Common Requirements Group	CRG001 - 40D250, 40D280, and 40D200
CRG 0002	Common Requirements Group	CRG002 - 40D290, 40D210, 40D300, and 40D220
CRG 0003	Common Requirements Group	CRG003 - Spent Acid Tanks
CRG 0004	Common Requirements Group	CRG004 - 99/Oleum/Spent Swing Tanks
GRP 0002	Equipment Group	CAP-SAU - SULFURIC ACID UNITS 1 & 2
GRP 0021	Equipment Group	CAP-Comb - CAP - Combustion (Unit 1, Unit 2, Rental Boiler)
PCS 0001	Process Group	Spt-Proc - Spent Acid Process
PCS 0002	Process Group	TS-Proc - TS Process
UNF 0002	Unit or Facility Wide	UNF02 - Facility Wide

Group Membership:

ID	Description	Member of Groups
ARE 0002	M4 - West End Sump	PCS0000000001
ARE 0003	M3 - Treatment Services Sumps	PCS0000000002
CRG 0001	CRG001 - 40D250, 40D280, and 40D200	PCS0000000002
CRG 0002	CRG002 - 40D290, 40D210, 40D300, and 40D220	PCS0000000002
CRG 0003	CRG003 - Spent Acid Tanks	PCS0000000001
CRG 0004	CRG004 - 99/Oleum/Spent Swing Tanks	PCS0000000001
EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank	CRG0000000003, PCS0000000001
EQT 0147	21 - TS Vapor Combustor	PCS0000000002
EQT 0150	26 - Spent Acid Barge Loading Scrubber	PCS0000000001

INVENTORIES

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Activity Number: PER20100009

Permit Number: 0840-00033-V3

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Group Membership:

ID	Description	Member of Groups
EQT 0151	27 - Acid Plant Vapor Combustor	PCS0000000001
EQT 0161	30D070 - Spent Acid Tank	CRG0000000003, PCS0000000001
EQT 0163	30D100 - Spent Acid Tank	CRG0000000003, PCS0000000001
EQT 0164	30D110 - Spent Acid Tank	CRG0000000003, PCS0000000001
EQT 0165	30D120 - Spent Acid Tank	CRG0000000003, PCS0000000001
EQT 0167	30D140 - 99/Oleum/Spent	CRG0000000004, PCS0000000001
EQT 0168	30D150 - 99/Oleum/Spent	CRG0000000004, PCS0000000001
EQT 0169	30D160 - Spent Acid Tank	CRG0000000003, PCS0000000001
EQT 0171	30D190 - Spent Acid Tank	CRG0000000003, PCS0000000001
EQT 0176	20D120/30D240 - IFS Mix Tank	PCS0000000001
EQT 0177	40D250 - Treatment Services Tank	CRG0000000001, PCS0000000002
EQT 0178	40D280 - Treatment Services Tank	CRG0000000001, PCS0000000002
EQT 0179	40D290 - Treatment Services Tank	CRG0000000002, PCS0000000002
EQT 0180	40D200 - Treatment Services Tank	CRG0000000001, PCS0000000002
EQT 0181	40D210 - Treatment Services Tank	CRG0000000002, PCS0000000002
EQT 0182	40D300 - Treatment Services Tank	CRG0000000002, PCS0000000002
EQT 0183	40D220 - Treatment Services Tank	CRG0000000002, PCS0000000002
EQT 0185	M7 - 001 Wastewater Treatment Unit	PCS0000000001
EQT 0186	1-06 - Rental Boiler	GRP0000000021
EQT 0277	13 - Acid Plant Caustic Scrubber	PCS0000000001
EQT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber	PCS0000000002
EQT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber	PCS0000000002
EQT 0280	U1-Furn - Unit 1 Furnace	PCS0000000002
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	PCS0000000002
EQT 0282	U2-SFurn - Unit 2 Sulfur Furnace	PCS0000000002
EQT 0283	U1-Proc - Unit 1 Process	PCS0000000002
EQT 0284	U2-Proc - Unit 2 Process	PCS0000000002
FUG 0002	FUG-ACID - Acid Plant Fugitive Emissions	PCS0000000001
FUG 0003	FUG-TS - Treatment Services Fugitive Emissions	PCS0000000002
RLP 0013	2 - Sulfuric Acid Unit No. 2	GRP0000000002, GRP0000000021, PCS0000000002
RLP 0014	3 - Sulfuric Acid Unit No. 1	GRP0000000002, GRP0000000021, PCS0000000002

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0540	0540 Sulphuric Acid Manufacture (Rated Capacity)	2800	tons/day

SIC Codes:

2819	Industrial inorganic chemicals, nec	AI 1314
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INVENTORIES

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

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Air - Title V Regular Permit Major Mod

SIC Codes:

2819	Industrial inorganic chemicals, nec	UNF 002
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EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

All phases

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Spent Acid Process															
ARE 0002 M4													0.03		0.14
EQT 0150 26										0.002	0.03	<0.01	1.12	51.40	0.93
EQT 0151 27	0.77	3.90	3.37	0.24	1.10	1.05	0.01	0.03	0.03	0.01	0.04	0.04	0.85	31.58	3.71
EQT 0185 M7													0.44		1.91
FUG 0002 FUG-ACID										0.31		1.38	0.15		0.65
TS Process															
ARE 0003 M3													0.02		0.07
EQT 0147 21	0.01	0.01	0.02	0.59	0.64	2.58	0.02	0.06	0.10	0.02	0.04	0.07	0.21	0.28	0.92
FUG 0003 FUG-TS													0.67		2.94
RLP 0013 2		74.61			134.56			23.75						1.84	
RLP 0014 3		44.26			63.27			11.25						0.52	
Facility Wide															
EQT 0140 10	0.47	0.47	2.06	0.56	0.56	2.45	0.04	0.04	0.19	0.03	0.03	0.14	0.03	0.03	0.13
EQT 0141 11							2.48		0.01						
EQT 0146 20										0.003		0.01	0.004		0.02
EQT 0152 28													0.07		0.29
EQT 0153 6-90	8.85	18.76	38.76	4.00	21.20	17.52	0.60	1.27	2.63	0.27	0.58	1.20	1.40	2.97	6.13
EQT 0154 M1a							0.63		2.76						
EQT 0155 M1b							0.28		1.23						
EQT 0186 1-06		3.59			5.05			0.99			0.08			0.72	
EQT 0291 M10	1.34		0.33	6.20		1.55	0.44		0.11	0.41		0.10	0.50		0.13
GRP 0021 CAP-Comb	11.69		51.22	21.00		91.98	11.67		51.10				1.96		8.58

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

All phases

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Phase I

SO2			
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year
TS Process			
RLP 0014 3		904.17	
Facility Wide			
GRP 0021 CAP-Comb	2841.67		12446.50

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

Emission rates Notes:

GRP 0021	SO2	Avg lb/hr	Phase I is effective from issuance of this permit through December 31, 2010. Which Months: All Year
GRP 0021	SO2	Tons/Year	Phase I is effective from issuance of this permit through December 31, 2010. Which Months: All Year
RLP 0014	SO2	Max lb/hr	Max lbs/hr effective from permit issuance until April 30, 2012. A 3-hour average becomes effective on May 1, 2012. Which Months: All Year

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Phase II

Subject Item	SO2		
	Avg lb/hr	Max lb/hr	Tons/Year
TS Process			
RLP 0014 3		904.17	
Facility Wide			
GRP 0021 CAP-Comb	1078.34		4723.13

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

Emission rates Notes:

GRP 0021	SO2	Avg lb/hr	Phase II is effective from January 1, 2011 through April 30, 2012. Which Months: All Year
GRP 0021	SO2	Tons/Year	Phase II is effective from January 1, 2011 through April 30, 2012. Which Months: All Year
RLP 0014	SO2	Max lb/hr	Max lbs/hr effective from permit issuance until April 30, 2012. A 3-hour average becomes effective on May 1, 2012. Which Months: All Year

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Phase III

Subject Item	SO2	
	Avg lb/hr	Tons/Year
Facility Wide		
GRP 0021 CAP-Comb	245.42	1074.94

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

Emission rates Notes:

GRP 0021	SO2	Avg lb/hr	Phase III becomes effective on May 1, 2012. Which Months: All Year
GRP 0021	SO2	Tons/Year	Phase III becomes effective on May 1, 2012. Which Months: All Year

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0142 12	Sulfuric acid	0.01	0.09	<0.01
EQT 0146 20	Carbon disulfide	0.004		0.02
	Hydrogen sulfide	0.10		0.44
EQT 0147 21	Chlorine	0.02	0.10	0.09
	Hydrochloric acid	0.08	0.42	0.36
EQT 0149 24	Sulfuric acid	0.004	0.01	<0.01
EQT 0151 27	Chlorine	0.02	0.54	0.09
	Hydrochloric acid	0.09	2.20	0.39
EQT 0152 28	2,2,4-Trimethylpentane	0.001		<0.01
	Benzene	0.001		<0.01
	Ethyl benzene	<0.001		<0.01
	Toluene	0.001		<0.01
	Xylene (mixed isomers)	<0.001		<0.01
	n-Hexane	0.001		<0.01
FUG 0002 FUG-ACID	Sulfuric acid	0.10		0.46
GRP 0002 CAP-SAU	Antimony (and compounds)	0.007		0.032
	Arsenic (and compounds)	0.005		0.022
	Barium (and compounds)	0.041		0.181
	Beryllium (Table 51.1)	0.003		0.012
	Cadmium (and compounds)	0.003		0.012
	Chlorine	0.02		0.09
	Chromium VI (and compounds)	0.007		0.030
	Cobalt compounds	0.01		0.03
	Copper (and compounds)	0.025		0.111
	Hydrochloric acid	1.09		4.79
	Lead compounds	0.02		0.08
	Manganese (and compounds)	0.02		0.08
	Mercury (and compounds)	0.003		0.012
	Nickel (and compounds)	0.009		0.038
	Selenium (and compounds)	0.013		0.056
	Sulfuric acid	9.57		41.90
	Zinc (and compounds)	0.05		0.22
PCS 0001 Sol-Proc	1,1,1-Trichloroethane	0.11		0.50

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	1,1,2,2-Tetrachloroethane	0.005		0.02
	1,1,2-Trichloroethane	0.05		0.20
	1,1-Dichloroethane	0.11		0.50
	1,1-Dimethylhydrazine	0.11		0.50
	1,2,4-Trichlorobenzene	0.11		0.50
	1,2-Dibromo-3-chloropropane	0.11		0.50
	1,2-Dibromoethane	<0.001		0.001
	1,2-Dichloroethane	0.001		0.002
	1,2-Dichloropropane	0.11		0.50
	1,2-Diphenylhydrazine	0.11		0.50
	1,2-Epoxybutane	0.11		0.50
	1,2-Epoxyethylbenzene	0.11		0.50
	1,2-Oxathiolane 2,2-dioxide	0.11		0.50
	1,3-Butadiene	<0.001		0.001
	1,3-Dichloropropene	0.005		0.02
	1,4-Dichlorobenzene	0.11		0.50
	1,4-Dioxane	0.01		0.05
	2,2'-dichlorodiethylether	0.03		0.11
	2,2,4-Trimethylpentane	0.11		0.50
	2,4,5-Trichlorophenol	0.11		0.50
	2,4,6-Trichlorophenol	0.11		0.50
	2,4-Dichlorophenoxyacetic Acid	0.11		0.50
	2,4-Dinitrophenol	0.11		0.50
	2,4-Dinitrotoluene	0.002		0.01
	2,4-Toluene diamine	0.11		0.50
	2,6-Dinitrotoluene	0.002		0.01
	2-Acetylaminofluorene	0.11		0.50
	2-nitro-Propane	0.03		0.14
	3,3'-Dichlorobenzidine	0.11		0.50
	4,4'-Methylenebis-(2-Chloroaniline)	0.11		0.50
	4,4'-Methylenebisbenzeneamine	0.11		0.50
	4,6 Dinitro-o-cresol	0.11		0.50
	4-Aminodiphenyl	0.11		0.50

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	4-Dimethylaminoazobenzene	0.11		0.50
	4-Nitrobiphenyl	0.11		0.50
	4-Nitrophenol	0.11		0.50
	Acetaldehyde	0.01		0.04
	Acetamide	0.11		0.50
	Acetonitrile	0.06		0.25
	Acetophenone	0.11		0.50
	Acrolein	<0.001		0.001
	Acrylamide	<0.001		0.001
	Acrylic acid	0.005		0.02
	Acrylonitrile	<0.001		0.002
	Allyl chloride	<0.001		0.001
	Amiben	0.11		0.50
	Ammonia	0.01		0.06
	Aniline	0.01		0.03
	Benzene	0.002		0.01
	Benzidine	0.11		0.50
	Benzotrichloride	0.11		0.50
	Benzyl chloride	0.11		0.50
	Biphenyl	0.002		0.01
	Bromoform	0.11		0.50
	Butene (mixed isomers)	0.11		0.50
	Calcium cyanamide	0.11		0.50
	Captan	0.11		0.50
	Carbaryl	0.11		0.50
	Carbon disulfide	0.03		0.12
	Carbon tetrachloride	0.002		0.01
	Carbonyl sulfide	0.01		0.05
	Chlordane	0.11		0.50
	Chlorine dioxide	<0.001		0.001
	Chloroacetic acid	0.11		0.50
	Chlorobenzene	<0.001		0.001
	Chloroethane	0.11		0.50

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	Chloroform	0.002		0.01
	Chloromethyl methyl ether	0.11		0.50
	Chloroprene	0.03		0.14
	Cresol	0.02		0.08
	Cumene	0.11		0.50
	Cyanide compounds	0.11		0.50
	Diaminotoluene (mixed isomers)	0.002		0.01
	Diazomethane	0.11		0.50
	Dibutyl phthalate	0.005		0.02
	Dichloromethane	0.01		0.03
	Dichlorvos	0.11		0.50
	Diethanolamine	0.11		0.50
	Diethyl Sulfate	0.11		0.50
	Dimethyl formamide	0.11		0.50
	Dimethyl phthalate	0.11		0.50
	Dimethyl sulfate	0.11		0.50
	Dimethylcarbamoyl chloride	0.11		0.50
	Epichlorohydrin	0.04		0.17
	Ethyl 4,4'-Dichlorobenzilate	0.11		0.50
	Ethyl Acrylate	0.02		0.08
	Ethyl benzene	0.11		0.50
	Ethylene	0.11		0.50
	Ethylene glycol	0.10		0.45
	Ethylene oxide	<0.001		0.002
	Ethyleneimine	0.11		0.50
	Ethylenethiourea	0.11		0.50
	Formaldehyde	0.002		0.01
	Glycol ethers (Table 51.1)	0.01		0.06
	Glycol ethers (Table 51.3)	0.11		0.50
	Heptachlor	0.11		0.50
	Hexachlorobenzene	0.01		0.04
	Hexachlorobutadiene	<0.001		0.001
	Hexachlorocyclopentadiene	0.11		0.50

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	Hexachloroethane	0.01		0.04
	Hexamethylene diisocyanate	0.11		0.50
	Hexamethylphosphoramide	0.11		0.50
	Hydrazine	<0.001		0.001
	Hydrofluoric acid	0.002		0.01
	Hydrogen cyanide	0.01		0.04
	Hydrogen sulfide	0.002		0.01
	Hydroquinone	0.11		0.50
	Iodomethane	0.11		0.50
	Isophorone	0.11		0.50
	Lindane	0.11		0.50
	Maleic anhydride	0.002		0.01
	Methanol	0.11		0.50
	Methoxychlor	0.11		0.50
	Methyl Isocyanate	0.11		0.50
	Methyl Tertiary Butyl Ether	0.11		0.50
	Methyl bromide	0.11		0.50
	Methyl chloride	0.09		0.39
	Methyl ethyl ketone	0.11		0.50
	Methyl isobutyl ketone	0.002		0.01
	Methyl methacrylate	0.11		0.50
	Methylene diphenyl diisocyanate	0.11		0.50
	Monomethyl hydrazine	0.11		0.50
	N,N-Diethyl aniline	0.11		0.50
	N,N-dimethylbenzenamine	0.11		0.50
	N-Nitroso-N-Methylurea	0.11		0.50
	N-Nitrosodimethylamine	0.11		0.50
	N-Nitrosomorpholine	0.11		0.50
	Naphthalene (and Methyl naphthalenes)	0.02		0.10
	Nitric acid	0.005		0.02
	Nitrobenzene	0.005		0.02
	Parathion	0.11		0.50
	Pentachloronitrobenzene	0.11		0.50

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	Phenol	0.005		0.02
	Phosgene	<0.001		0.002
	Phosphine	0.11		0.50
	Phosphorus, Total (as P)	0.11		0.50
	Phthalic Anhydride	0.005		0.02
	Polychlorinated biphenyls	0.11		0.50
	Polynuclear Aromatic Hydrocarbons	<0.001		0.001
	Propionaldehyde	0.01		0.04
	Propoxur	0.11		0.50
	Propylene	0.11		0.50
	Propylene oxide	0.01		0.04
	Propylenimine	0.11		0.50
	Pyridine	0.01		0.06
	Pyrocatechol	0.11		0.50
	Quinoline	0.11		0.50
	Quinone	0.11		0.50
	Styrene	0.02		0.10
	Tetrachloroethylene	0.03		0.14
	Titanium tetrachloride	0.11		0.50
	Toluene	0.11		0.50
	Toluene-2,4-diisocyanate	<0.001		0.001
	Toluene-2,6-Diisocyanate	<0.001		0.001
	Toxaphene	0.11		0.50
	Toxic air pollutants (TAP)	0.21		0.59
	Trichloroethylene	0.01		0.05
	Triethyl amine	0.11		0.50
	Trifluralin	0.11		0.50
	Urethane	0.11		0.50
	Vinyl acetate	0.03		0.13
	Vinyl bromide	0.11		0.50
	Vinyl chloride	0.002		0.01
	Vinylidene chloride	0.02		0.08
	Xylene (mixed isomers)	0.11		0.50

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	alpha-Chloroacetophenone	0.11		0.50
	beta-Propiolactone	0.11		0.50
	bis(2-ethylhexyl)phthalate	0.11		0.50
	bis(Chloromethyl)ether	0.11		0.50
	n-Hexane	0.11		0.50
	n-butyl alcohol	0.11		0.50
	o-Aminoanisole	0.11		0.50
	o-dianisidine	0.11		0.50
	ortho-Tolidine	0.11		0.50
	ortho-Toluidine	0.11		0.50
	p,p'-DDE	0.11		0.50
	para-Phenylenediamine	0.11		0.50
	pentachloro-Phenol	0.11		0.50
PCS 0002 TS-Proc	1,1,1-Trichloroethane	0.11		0.50
	1,1,2,2-Tetrachloroethane	0.03		0.12
	1,1,2-Trichloroethane	0.11		0.50
	1,1-Dichloroethane	0.11		0.50
	1,1-Dimethylhydrazine	0.11		0.50
	1,2,4-Trichlorobenzene	0.11		0.50
	1,2-Dibromo-3-chloropropane	0.11		0.50
	1,2-Dibromoethane	0.003		0.011
	1,2-Dichloroethane	0.005		0.021
	1,2-Dichloropropane	0.11		0.50
	1,2-Diphenylhydrazine	0.11		0.50
	1,2-Epoxybutane	0.11		0.50
	1,2-Epoxyethylbenzene	0.11		0.50
	1,2-Oxathiolane 2,2-dioxide	0.11		0.50
	1,3-Butadiene	0.003		0.011
	1,3-Dichloropropene	0.03		0.14
	1,4-Dichlorobenzene	0.11		0.50
	1,4-Dioxane	0.10		0.44
	2,2'-dichlorodiethylether	0.11		0.50
	2,2,4-Trimethylpentane	0.11		0.50

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0002 TS-Proc	2,4,5-Trichlorophenol	0.11		0.50
	2,4,6-Trichlorophenol	0.11		0.50
	2,4-Dichlorophenoxyacetic Acid	0.11		0.50
	2,4-Dinitrophenol	0.11		0.50
	2,4-Dinitrotoluene	0.01		0.03
	2,4-Toluene diamine	0.11		0.50
	2,6-Dinitrotoluene	0.01		0.03
	2-Acetylaminofluorene	0.11		0.50
	2-nitro-Propane	0.11		0.50
	3,3'-Dichlorobenzidine	0.11		0.50
	4,4'-Methylenebis-(2-Chloroaniline)	0.11		0.50
	4,4'-Methylenebisbenzeneamine	0.11		0.50
	4,6 Dinitro-o-cresol	0.11		0.50
	4-Aminodiphenyl	0.11		0.50
	4-Dimethylaminoazobenzene	0.11		0.50
	4-Nitrobiphenyl	0.11		0.50
	4-Nitrophenol	0.11		0.50
	Acetaldehyde	0.07		0.30
	Acetamide	0.11		0.50
	Acetonitrile	0.11		0.50
	Acetophenone	0.11		0.50
	Acrolein	0.003		0.011
	Acrylamide	0.003		0.011
	Acrylic acid	0.04		0.17
	Acrylonitrile	0.003		0.015
	Allyl chloride	0.003		0.011
	Amiben	0.11		0.50
	Ammonia	0.11		0.50
	Aniline	0.06		0.26
	Benzene	0.02		0.10
	Benzidine	0.11		0.50
	Benzotrichloride	0.11		0.50
	Benzyl chloride	0.11		0.50

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0002 TS-Proc	Biphenyl	0.01		0.03
	Bromoform	0.11		0.50
	Butene (mixed isomers)	0.11		0.50
	Calcium cyanamide	0.11		0.50
	Captan	0.11		0.50
	Carbaryl	0.11		0.50
	Carbon disulfide	0.11		0.50
	Carbon tetrachloride	0.01		0.03
	Carbonyl sulfide	0.10		0.43
	Chlordane	0.11		0.50
	Chlorinated Dibenzo-P-Dioxins	0.00000001		0.00000005
	Chlorinated dibenzofurans	0.00000001		0.00000005
	Chlorine dioxide	0.003		0.011
	Chloroacetic acid	0.11		0.50
	Chlorobenzene	0.003		0.011
	Chloroethane	0.11		0.50
	Chloroform	0.005		0.02
	Chloromethyl methyl ether	0.11		0.50
	Chloroprene	0.11		0.50
	Cresol	0.11		0.50
	Cumene	0.11		0.50
	Cyanide compounds	0.11		0.50
	Diaminotoluene (mixed isomers)	0.03		0.11
	Diazomethane	0.11		0.50
	Dibutyl phthalate	0.04		0.16
	Dichloromethane	0.05		0.23
	Dichlorvos	0.11		0.50
	Diethanolamine	0.11		0.50
	Diethyl Sulfate	0.11		0.50
	Dimethyl formamide	0.11		0.50
	Dimethyl phthalate	0.11		0.50
	Dimethyl sulfate	0.11		0.50
	Dimethylcarbamoyl chloride	0.11		0.50

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0002 TS-Proc	Epichlorohydrin	0.11		0.50
	Ethyl 4,4'-Dichlorobenzilate	0.11		0.50
	Ethyl Acrylate	0.11		0.50
	Ethyl benzene	0.11		0.50
	Ethylene	0.11		0.50
	Ethylene glycol	0.11		0.50
	Ethylene oxide	0.003		0.015
	Ethyleneimine	0.11		0.50
	Ethylenethiourea	0.11		0.50
	Formaldehyde	0.03		0.11
	Glycol ethers (Table 51.1)	0.11		0.50
	Glycol ethers (Table 51.3)	0.11		0.50
	Heptachlor	0.11		0.50
	Hexachlorobenzene	0.08		0.37
	Hexachlorobutadiene	0.003		0.011
	Hexachlorocyclopentadiene	0.11		0.50
	Hexachloroethane	0.07		0.30
	Hexamethylene diisocyanate	0.11		0.50
	Hexamethylphosphoramide	0.11		0.50
	Hydrazine	0.003		0.011
	Hydrofluoric acid	0.005		0.02
	Hydrogen cyanide	0.08		0.34
	Hydrogen sulfide	0.01		0.04
	Hydroquinone	0.11		0.50
	Iodomethane	0.11		0.50
	Isophorone	0.11		0.50
	Lindane	0.11		0.50
	Maleic anhydride	0.005		0.02
	Methanol	0.11		0.50
	Methoxychlor	0.11		0.50
	Methyl Isocyanate	0.11		0.50
	Methyl Tertiary Butyl Ether	0.11		0.50
	Methyl bromide	0.11		0.50

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0002 TS-Proc	Methyl chloride	0.11		0.50
	Methyl ethyl ketone	0.11		0.50
	Methyl isobutyl ketone	0.002		0.01
	Methyl methacrylate	0.11		0.50
	Methylene diphenyl diisocyanate	0.11		0.50
	Monomethyl hydrazine	0.11		0.50
	N,N-Diethyl aniline	0.11		0.50
	N,N-dimethylbenzenamine	0.11		0.50
	N-Nitroso-N-Methylurea	0.11		0.50
	N-Nitrosodimethylamine	0.11		0.50
	N-Nitrosomorpholine	0.11		0.50
	Naphthalene (and Methyl naphthalenes)	0.11		0.50
	Nitric acid	0.03		0.12
	Nitrobenzene	0.04		0.17
	Parathion	0.11		0.50
	Pentachloronitrobenzene	0.11		0.50
	Phenol	0.04		0.16
	Phosgene	0.003		0.012
	Phosphine	0.11		0.50
	Phosphorus, Total (as P)	0.11		0.50
	Phthalic Anhydride	0.04		0.17
	Polychlorinated biphenyls	0.11		0.50
	Polynuclear Aromatic Hydrocarbons	0.003		0.011
	Propionaldehyde	0.07		0.30
	Propoxur	0.11		0.50
	Propylene	0.11		0.50
	Propylene oxide	0.07		0.30
	Propylenimine	0.11		0.50
	Pyridine	0.11		0.50
	Pyrocatechol	0.11		0.50
	Quinoline	0.11		0.50
	Quinone	0.11		0.50
	Styrene	0.11		0.50

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0002 TS-Proc	Tetrachloroethylene	0.11		0.50
	Titanium tetrachloride	0.11		0.50
	Toluene	0.11		0.50
	Toluene-2,4-diisocyanate	0.003		0.011
	Toluene-2,6-Diisocyanate	0.003		0.011
	Toxaphene	0.11		0.50
	Toxic air pollutants (TAP)	0.46		2.03
	Trichloroethylene	0.09		0.38
	Triethyl amine	0.11		0.50
	Trifluralin	0.11		0.50
	Urethane	0.11		0.50
	Vinyl acetate	0.11		0.50
	Vinyl bromide	0.11		0.50
	Vinyl chloride	0.02		0.10
	Vinylidene chloride	0.11		0.50
	Xylene (mixed isomers)	0.11		0.50
	alpha-Chloroacetophenone	0.11		0.50
	beta-Propiolactone	0.11		0.50
	bis(2-ethylhexyl)phthalate	0.11		0.50
	bis(Chloromethyl)ether	0.11		0.50
	n-Hexane	0.11		0.50
	n-butyl alcohol	0.11		0.50
	o-Aminoanisole	0.11		0.50
	o-dianisidine	0.11		0.50
	ortho-Tolidine	0.11		0.50
	ortho-Toluidine	0.11		0.50
	p,p'-DDE	0.11		0.50
	para-Phenylenediamine	0.11		0.50
	pentachloro-Phenol	0.11		0.50
RLP 0013 2	Antimony (and compounds)		0.671	
	Arsenic (and compounds)		0.001	
	Barium (and compounds)		1.313	
	Beryllium (Table 51.1)		0.001	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20100009
Permit Number: 0840-00033-V3
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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
RLP 0013 2	Cadmium (and compounds)		0.001	
	Chlorine		0.05	
	Chromium VI (and compounds)		0.006	
	Cobalt compounds		0.17	
	Copper (and compounds)		0.632	
	Hydrochloric acid		2.12	
	Lead compounds		0.12	
	Manganese (and compounds)		0.43	
	Mercury (and compounds)		0.013	
	Nickel (and compounds)		0.006	
	Selenium (and compounds)		0.413	
	Sulfuric acid		11.88	
	Zinc (and compounds)		1.24	
RLP 0014 3	Antimony (and compounds)		0.466	
	Arsenic (and compounds)		0.004	
	Barium (and compounds)		0.778	
	Beryllium (Table 51.1)		<0.001	
	Cadmium (and compounds)		<0.001	
	Chlorine		0.20	
	Chromium VI (and compounds)		0.001	
	Cobalt compounds		0.11	
	Copper (and compounds)		0.379	
	Hydrochloric acid		14.87	
	Lead compounds		0.08	
	Manganese (and compounds)		0.26	
	Mercury (and compounds)		0.011	
	Nickel (and compounds)		0.003	
	Selenium (and compounds)		0.373	
	Sulfuric acid		5.63	
	Zinc (and compounds)		0.75	
UNF 0002 UNF02	1,1,1-Trichloroethane			1.00
	1,1,2,2-Tetrachloroethane			0.14
	1,1,2-Trichloroethane			0.70

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002 UNF02	1,1-Dichloroethane			1.00
	1,1-Dimethylhydrazine			1.00
	1,2,4-Trichlorobenzene			1.00
	1,2-Dibromo-3-chloropropane			1.00
	1,2-Dibromoethane			0.012
	1,2-Dichloroethane			0.023
	1,2-Dichloropropane			1.00
	1,2-Diphenylhydrazine			1.00
	1,2-Epoxybutane			1.00
	1,2-Epoxyethylbenzene			1.00
	1,2 Oxathiolane 2,2-dioxide			1.00
	1,3-Butadiene			0.012
	1,3-Dichloropropene			0.16
	1,4-Dichlorobenzene			1.00
	1,4-Dioxane			0.49
	2,2'-dichlorodiethylether			0.61
	2,2,4-Trimethylpentane			1.01
	2,4,5-Trichlorophenol			1.00
	2,4,6-Trichlorophenol			1.00
	2,4-Dichlorophenoxyacetic Acid			1.00
	2,4-Dinitrophenol			1.00
	2,4-Dinitrotoluene			0.04
	2,4-Toluene diamine			1.00
	2,6-Dinitrotoluene			0.04
	2-Acetylamino fluorene			1.00
	2-nitro-Propane			0.64
	3,3'-Dichlorobenzidine			1.00
	4,4'-Methylenebis-(2-Chloroaniline)			1.00
	4,4'-Methylenebisbenzeneamine			1.00
	4,6 Dinitro-o-cresol			1.00
	4-Aminodiphenyl			1.00
	4-Dimethylaminoazobenzene			1.00
	4-Nitrobiphenyl			1.00

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002 UNF02	4-Nitrophenol			1.00
	Acetaldehyde			0.34
	Acetamide			1.00
	Acetonitrile			0.75
	Acetophenone			1.00
	Acrolein			0.012
	Acrylamide			0.012
	Acrylic acid			0.19
	Acrylonitrile			0.017
	Allyl chloride			0.012
	Amiben			1.00
	Ammonia			0.56
	Aniline			0.29
	Antimony (and compounds)			0.032
	Arsenic (and compounds)			0.022
	Barium (and compounds)			0.181
	Benzene			0.12
	Benzidine			1.00
	Benzotrichloride			1.00
	Benzyl chloride			1.00
	Beryllium (Table 51.1)			0.012
	Biphenyl			0.04
	Bromoform			1.00
	Butene (mixed isomers)			1.00
	Cadmium (and compounds)			0.012
	Calcium cyanamide			1.00
	Captan			1.00
	Carbaryl			1.00
	Carbon disulfide			0.64
	Carbon tetrachloride			0.04
	Carbonyl sulfide			0.48
	Chlordane			1.00
	Chlorinated Dibenzo-P-Dioxins			0.00000005

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002 UNF02	Chlorinated dibenzofurans			0.00000005
	Chlorine			0.27
	Chlorine dioxide			0.012
	Chloroacetic acid			1.00
	Chlorobenzene			0.012
	Chloroethane			1.00
	Chloroform			0.03
	Chloromethyl methyl ether			1.00
	Chloroprene			0.64
	Chromium VI (and compounds)			0.030
	Cobalt compounds			0.03
	Copper (and compounds)			0.111
	Cresol			0.58
	Cumene			1.00
	Cyanide compounds			1.00
	Diaminotoluene (mixed isomers)			0.12
	Diazomethane			1.00
	Dibutyl phthalate			0.18
	Dichloromethane			0.26
	Dichlorvos			1.00
	Diethanolamine			1.00
	Diethyl Sulfate			1.00
	Dimethyl formamide			1.00
	Dimethyl phthalate			1.00
	Dimethyl sulfate			1.00
	Dimethylcarbonyl chloride			1.00
	Epichlorohydrin			0.67
	Ethyl 4,4'-Dichlorobenzilate			1.00
	Ethyl Acrylate			0.58
	Ethyl benzene			1.01
	Ethylene			1.00
	Ethylene glycol			0.95
	Ethylene oxide			0.017

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002 UNF02	Ethyleneimine			1.00
	Ethylenethiourea			1.00
	Formaldehyde			0.12
	Glycol ethers (Table 51.1)			0.56
	Glycol ethers (Table 51.3)			1.00
	Heptachlor			1.00
	Hexachlorobenzene			0.41
	Hexachlorobutadiene			0.012
	Hexachlorocyclopentadiene			1.00
	Hexachloroethane			0.34
	Hexamethylene diisocyanate			1.00
	Hexamethylphosphoramide			1.00
	Hydrazine			0.012
	Hydrochloric acid			5.54
	Hydrofluoric acid			0.03
	Hydrogen cyanide			0.38
	Hydrogen sulfide			0.49
	Hydroquinone			1.00
	Iodomethane			1.00
	Isophorone			1.00
	Lead compounds			0.08
	Lindane			1.00
	Maleic anhydride			0.03
	Manganese (and compounds)			0.08
	Mercury (and compounds)			0.012
	Methanol			1.00
	Methoxychlor			1.00
	Methyl Isocyanate			1.00
	Methyl Tertiary Butyl Ether			1.00
	Methyl bromide			1.00
	Methyl chloride			0.89
	Methyl ethyl ketone			1.00
	Methyl isobutyl ketone			0.02

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002 UNF02	Methyl methacrylate			1.00
	Methylene diphenyl diisocyanate			1.00
	Monomethyl hydrazine			1.00
	N,N-Diethyl aniline			1.00
	N,N-dimethylbenzenamine			1.00
	N-Nitroso-N-Methylurea			1.00
	N-Nitrosodimethylamine			1.00
	N-Nitrosomorpholine			1.00
	Naphthalene (and Methyl naphthalenes)			0.60
	Nickel (and compounds)			0.038
	Nitric acid			0.14
	Nitrobenzene			0.19
	Parathion			1.00
	Pentachloronitrobenzene			1.00
	Phenol			0.18
	Phosgene			0.014
	Phosphine			1.00
	Phosphorus, Total (as P)			1.00
	Phthalic Anhydride			0.19
	Polychlorinated biphenyls			1.00
	Polynuclear Aromatic Hydrocarbons			0.012
	Propionaldehyde			0.34
	Propoxur			1.00
	Propylene			1.00
	Propylene oxide			0.34
	Propylenimine			1.00
	Pyridine			0.56
	Pyrocatechol			1.00
	Quinoline			1.00
	Quinone			1.00
	Selenium (and compounds)			0.056
	Styrene			0.60
	Sulfuric acid			42.36

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002 UNF02	Tetrachloroethylene			0.64
	Titanium tetrachloride			1.00
	Toluene			1.01
	Toluene-2,4-diisocyanate			0.012
	Toluene-2,6-Diisocyanate			0.012
	Toxaphene			1.00
	Trichloroethylene			0.43
	Triethyl amine			1.00
	Trifluralin			1.00
	Urethane			1.00
	Vinyl acetate			0.63
	Vinyl bromide			1.00
	Vinyl chloride			0.11
	Vinylidene chloride			0.58
	Xylene (mixed isomers)			1.01
	Zinc (and compounds)			0.22
	alpha-Chloroacetophenone			1.00
	beta-Propiolactone			1.00
	bis(2-ethylhexyl)phthalate			1.00
	bis(Chloromethyl)ether			1.00
	n-Hexane			1.01
	n-butyl alcohol			1.00
	o-Aminoanisole			1.00
	o-dianisidine			1.00
	ortho-Tolidine			1.00
	ortho-Toluidine			1.00
	p,p'-DDE			1.00
	para-Phenylenediamine			1.00
	pentachloro-Phenol			1.00

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

Emission Rates Notes:

PCS 0001 1,1,1-Trichloroethane Tons/Year Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
Which Months: All Year

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PCS 0001	1,1,2,2-Tetrachloroethane	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	1,1,2-Trichloroethane	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	1,1-Dichloroethane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	1,1-Dimethylhydrazine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	1,2,4-Trichlorobenzene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	1,2-Dibromo-3-chloropropane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	1,2-Dibromoethane	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	1,2-Dichloroethane	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	1,2-Dichloropropane	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	1,2-Diphenylhydrazine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	1,2-Epoxybutane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	1,2-Epoxyethylbenzene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	1,2-Oxathiolane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	2,2-dioxide	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	1,3-Butadiene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	1,3-Dichloropropene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	1,4-Dichlorobenzene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	1,4-Dioxane	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	2,2'-dichlorodiethylether	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	2,2,4-Trimethylpentane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	2,4,5-Trichlorophenol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	2,4,6-Trichlorophenol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	2,4-Dichlorophenoxyacetic Acid	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	2,4-Dinitrophenol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	2,4-Dinitrotoluene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	2,4-Toluene diamine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	2,6-Dinitrotoluene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	2-Acetylaminofluorene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	2-nitro-Propane	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	3,3'-Dichlorobenzidine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	4,4'-Methylenebis-(2-	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	

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PCS 0001	Chloroaniline)	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	4,4'-Methylenebisbenzidine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	4,6 Dinitro-o-cresol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	4-Aminodiphenyl	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	4-Dimethylaminoazobenzene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	4-Nitrobiphenyl	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	4-Nitrophenol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Acetaldehyde	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Acetamide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Acetonitrile	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Acetophenone	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Acrolein	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Acrylamide	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Acrylic acid	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Acrylonitrile	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Allyl chloride	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Amiben	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Ammonia	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Aniline	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Benzene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Benzidine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Benzotrichloride	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Benzyl chloride	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Biphenyl	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Bromoform	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Butene (mixed isomers)	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Calcium cyanamide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Captan	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Carbaryl	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Carbon disulfide	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Carbon tetrachloride	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Carbonyl sulfide	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Chlordane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0001	Chlorine dioxide	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All

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PCS 0001			Which Months: All Year
PCS 0001	Chloroacetic acid	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Chlorobenzene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Chloroethane	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Chloroform	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Chloromethyl methyl ether	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Chloroprene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Cresol	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Cumene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Cyanide compounds	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Diaminotoluene (mixed isomers)	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Diazomethane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Dibutyl phthalate	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Dichloromethane	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Dichlorvos	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Diethanolamine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Diethyl Sulfate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Dimethyl formamide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Dimethyl phthalate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Dimethyl sulfate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Dimethylcarbamoyl chloride	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Epichlorohydrin	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Ethyl 4,4'-Dichlorobenzilate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Ethyl Acrylate	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Ethyl benzene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Ethylene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Ethylene glycol	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Ethylene oxide	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Ethyleneimine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Ethylenethiourea	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Formaldehyde	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Glycol ethers (Table 51.1)	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Glycol ethers (Table 51.3)	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Heptachlor	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Hexachlorobenze	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)

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PCS 0001	ne		Which Months: All Year
PCS 0001	Hexachlorobutadiene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Hexachlorocyclopentadiene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Hexachloroethane	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Hexamethylene diisocyanate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Hexamethylphosphoramide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Hydrazine	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Hydrofluoric acid	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Hydrogen cyanide	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Hydrogen sulfide	Tons/Year	Annual rate conservatively set at 20 lbs/yr to keep total emissions < MER. Which Months: All Year
PCS 0001	Hydroquinone	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Iodomethane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Isophorone	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Lindane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Maleic anhydride	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Methanol	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Methoxychlor	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Methyl Isocyanate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Methyl Tertiary Butyl Ether	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Methyl bromide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Methyl chloride	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Methyl ethyl ketone	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Methyl isobutyl ketone	Tons/Year	To remain under 10 tpy sitewide, allotted 20 lbs/y Which Months: All Year
PCS 0001	Methyl methacrylate	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Methylene diphenyl diisocyanate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Monomethyl hydrazine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	N,N-Diethyl aniline	Avg lb/hr	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	N,N-dimethylbenzamine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	N-Nitroso-N-Methylurea	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	N-Nitrosodimethylamine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	N-Nitrosomorpholine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Naphthalene (and Methyl naphthalenes)	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Nitric acid	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)

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PCS 0001			Which Months: All Year
PCS 0001	Nitrobenzene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Parathion	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Pentachloronitrobenzene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Phenol	Tons/Year	Annual rate is minimum of [(10% of (MER - CVAL emissions), 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Phosgene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Phosphine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Phosphorus, Total (as P)	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Phthalic Anhydride	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Polychlorinated biphenyls	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Polynuclear Aromatic Hydrocarbons	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Propionaldehyde	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Propoxur	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Propylene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Propylene oxide	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Propylenimine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Pyridine	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Pyrocatechol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Quinoline	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Quinone	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Styrene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Tetrachloroethylene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Titanium tetrachloride	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Toluene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Toluene-2,4-diisocyanate	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Toluene-2,6-Diisocyanate	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Toxaphene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Toxic air pollutants (TAP)	Tons/Year	Overall limit on total TAPs for the process. The sum of individual TAP limits is greater than this limit (for operational flexibility) but the overall limit cannot be exceeded. Annual rate is a cap on total toxic air pollutants (TAPs) for this process. Total TAPs for the Sulfuric Acid Plant are limited to 8.92 tpy which is the sum of PSC001 TAP cap, PSC002 TAP cap, individual TAP limits on other sources, and GCVXII TAPs Which Months: All Year
PCS 0001	Trichloroethylene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Triethyl amine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Trifluralin	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Urethane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0001	Vinyl acetate	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)

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PCS 0001			Which Months: All Year	
PCS 0001	Vinyl bromide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0001	Vinyl chloride	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0001	Vinylidene chloride	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0001	Xylene (mixed isomers)	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0001	alpha-Chloroacetophenone	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0001	beta-Propiolactone	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0001	bis(2-ethylhexyl)phthalate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0001	bis(Chloromethyl) ether	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0001	n-Hexane	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0001	n-butyl alcohol	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0001	o-Aminoanisole	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0001	o-dianisidine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0001	ortho-Tolidine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0001	ortho-Toluidine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0001	p,p'-DDE	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0001	para-Phenylenediamine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0001	pentachloro-Phenol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	1,1,1-Trichloroethane	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	1,1,2,2-Tetrachloroethane	Tons/Year	Annual rate is minimum of (80% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	1,1,2-Trichloroethane	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	1,1-Dichloroethane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	1,1-Dimethylhydrazine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	1,2,4-Trichlorobenzene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	1,2-Dibromo-3-chloropropane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	1,2-Dibromoethane	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	1,2-Dichloroethane	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	1,2-Dichloropropane	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	1,2-Diphenylhydrazine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	1,2-Epoxybutane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	1,2-Epoxyethylbenzene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year

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PCS 0002	1,2-Oxathiolane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	2,2-dioxide	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	1,3-Butadiene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	1,3-Dichloropropene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	1,4-Dichlorobenzene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	1,4-Dioxane	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	2,2'-dichlorodiethylether	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	2,2,4-Trimethylpentane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	2,4,5-Trichlorophenol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	2,4,6-Trichlorophenol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	2,4-Dichlorophenoxy acetic Acid	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	2,4-Dinitrophenol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	2,4-Dinitrotoluene	Tons/Year	Annual rate is minimum of (65% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	2,4-Toluene diamine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	2,6-Dinitrotoluene	Tons/Year	Annual rate is minimum of (65% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	2-Acetylaminofluorene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	2-nitro-Propane	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	3,3'-Dichlorobenzidine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	4,4'-Methylenebis-(2-Chloroaniline)	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	4,4'-Methylenebisbenzeneamine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	4,6 Dinitro-o-cresol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	4-Aminodiphenyl	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	4-Dimethylaminoazobenzene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	4-Nitrobiphenyl	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	4-Nitrophenol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Acetaldehyde	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Acetamide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Acetonitrile	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Acetophenone	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Acrolein	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Acrylamide	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Acrylic acid	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

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PCS 0002			Which Months: All Year
PCS 0002	Acrylonitrile	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
			Which Months: All Year
PCS 0002	Allyl chloride	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
			Which Months: All Year
PCS 0002	Amiben	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Ammonia	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
			Which Months: All Year
PCS 0002	Aniline	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
			Which Months: All Year
PCS 0002	Benzene	Tons/Year	Annual rate is minimum of (80% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
			Which Months: All Year
PCS 0002	Benzidine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Benzotrichloride	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Benzyl chloride	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Biphenyl	Tons/Year	Annual rate is minimum of (70% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
			Which Months: All Year
PCS 0002	Bromoform	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Butene (mixed isomers)	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Calcium cyanamide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Captan	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Carbaryl	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Carbon disulfide	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
			Which Months: All Year
PCS 0002	Carbon tetrachloride	Tons/Year	Annual rate is minimum of (80% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
			Which Months: All Year
PCS 0002	Carbonyl sulfide	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
			Which Months: All Year
PCS 0002	Chlordane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Chlorinated Dibenzo-P-Dioxins	Tons/Year	Stack test data on Unit 1 and Unit Which Months: All Year
PCS 0002	Chlorinated dibenzofurans	Tons/Year	Stack test data on Unit 1 and Unit 2 Which Months: All Year
PCS 0002	Chlorine dioxide	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
			Which Months: All Year
PCS 0002	Chloroacetic acid	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Chlorobenzene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
			Which Months: All Year
PCS 0002	Chloroethane	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
			Which Months: All Year
PCS 0002	Chloroform	Tons/Year	Annual rate is minimum of (70% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
			Which Months: All Year
PCS 0002	Chloromethyl methyl ether	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Chloroprene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
			Which Months: All Year
PCS 0002	Cresol	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
			Which Months: All Year
PCS 0002	Cumene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
			Which Months: All Year
PCS 0002	Cyanide compounds	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Diaminotoluene (mixed isomers)	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
			Which Months: All Year
PCS 0002	Diazomethane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year

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PCS 0002	Dibutyl phthalate	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Dichloromethane	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Dichlorvos	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Diethanolamine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Diethyl Sulfate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Dimethyl formamide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Dimethyl phthalate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Dimethyl sulfate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Dimethylcarbamoyl chloride	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Epichlorohydrin	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Ethyl 4,4'-Dichlorobenzilate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Ethyl Acrylate	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Ethyl benzene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Ethylene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Ethylene glycol	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Ethylene oxide	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Ethyleneimine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Ethylenethiourea	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Formaldehyde	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Glycol ethers (Table 51.1)	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Glycol ethers (Table 51.3)	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Heptachlor	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Hexachlorobenzene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Hexachlorobutadiene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Hexachlorocyclopentadiene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Hexachloroethane	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Hexamethylene diisocyanate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Hexamethylphosphoramide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Hydrazine	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Hydrofluoric acid	Tons/Year	Annual rate is minimum of (75% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Hydrogen cyanide	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Hydrogen sulfide	Tons/Year	Annual rate conservatively set at 80 lbs/yr to keep total emissions < MER. Which Months: All Year	
PCS 0002	Hydroquinone	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Iodomethane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0002	Isophorone	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

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PCS 0002			Year	
PCS 0002	Lindane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Maleic anhydride	Tons/Year	Annual rate is minimum of (70% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Methanol	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Methoxychlor	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Methyl Isocyanate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Methyl Tertiary Butyl Ether	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Methyl bromide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Methyl chloride	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Methyl ethyl ketone	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Methyl isobutyl ketone	Tons/Year	To remain under 10 tpy sitewide, allotted 20 lbs/yr	Which Months: All Year
PCS 0002	Methyl methacrylate	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Methylene diphenyl diisocyanate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Monomethyl hydrazine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	N,N-Diethyl aniline	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	N,N-dimethylbenzamine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	N-Nitroso-N-Methylurea	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	N-Nitrosodimethylamine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	N-Nitrosomorpholine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Naphthalene (and Methyl naphthalenes)	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Nitric acid	Tons/Year	Annual rate is minimum of (80% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Nitrobenzene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Parathion	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Pentachloronitrobenzene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Phenol	Tons/Year	Annual rate is minimum of [(85% of (MER - CVAL emissions), 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Phosgene	Tons/Year	Annual rate is minimum of (80% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Phosphine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Phosphorus, Total (as P)	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Phthalic Anhydride	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Polychlorinated biphenyls	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Polynuclear Aromatic Hydrocarbons	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Propionaldehyde	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	

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PCS 0002			Which Months: All Year	
PCS 0002	Propoxur	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Propylene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Propylene oxide	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Propylenimine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Pyridine	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Pyrocatechol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Quinoline	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Quinone	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Styrene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Tetrachloroethylene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Titanium tetrachloride	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Toluene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Toluene-2,4-diisocyanate	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Toluene-2,6-Diisocyanate	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Toxaphene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Toxic air pollutants (TAP)	Tons/Year	Overall limit on total TAPs for the process. The sum of individual TAP limits is greater than this limit (for operational flexibility) but the overall limit cannot be exceeded. Annual rate is a cap on total toxic air pollutants (TAPs) for this process. Total TAPs for the Sulfuric Acid Plant are limited to 8.92 tpy which is the sum of PSC001 TAP cap, PSC0002 TAP cap, individual TAP limits on other sources, and GCVXII TAPs	
PCS 0002	Trichloroethylene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Triethyl amine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Trifluralin	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Urethane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Vinyl acetate	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Vinyl bromide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Vinyl chloride	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Vinylidene chloride	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	Xylene (mixed isomers)	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	alpha-Chloroacetophenone	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	beta-Propiolactone	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	bis(2-ethylhexyl)phthalate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	bis(Chloromethyl) ether	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	n-Hexane	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year
PCS 0002	n-butyl alcohol	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All Year

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PCS 0002	o-Aminoanisole	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0002	o-dianisidine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0002	ortho-Tolidine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0002	ortho-Toluidine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0002	p,p'-DDE	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0002	para-Phenylenediamine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0002	pentachloro-Phenol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

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Air - Title V Regular Permit Major Mod

Group: PCS 0001 Spent Acid Process

Group Members: ARE 0002CRG 0003 CRG 0004 EQT 0008EQT 0150EQT 0151EQT 0161EQT 0163EQT 0164EQT 0165EQT 0167EQT 0168EQT 0169EQT 0171EQT 0176EQT 0185EQT 0277FUG 0002

ARE 0002 M4 - West End Sump

- 1 [LAC 33:III.5107.A.2] Emits Class III TAP (via process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

CRG 0003 CRG003 - Spent Acid Tanks

Group Members: EQT 0008EQT 0161EQT 0163EQT 0164EQT 0165EQT 0169EQT 0171

- 2 [40 CFR 60.110b(e)] Complies with 40 CFR 60 Subpart Kb by complying with 40 CFR 65 Subparts C and G. Monitoring requirements of 40 CFR 60.116b(c), (e), (f)(1), and (g) still apply. Subpart Kb. [40 CFR 60.110b(e)]
- 3 [40 CFR 65.145(c)(2)] Equipment/operational data monitored by technically sound method at the approved frequency. Monitor the disposition of spent acid tank vent (Sulfuric Acid Unit No. 1 versus APVC). Subpart G. [40 CFR 65.145(c)(2)]
Which Months: All Year Statistical Basis: None specified
- 4 [40 CFR 65.42(b)(5)] Operate and maintain a closed vent system and a control device. Ensure that the control device is designed and operated to reduce inlet emissions of regulated material by 95% or greater, except during periods of planned routine maintenance or during a control system malfunction. Ensure that periods of planned routine maintenance do not exceed 240 hours per year. Subpart C. [40 CFR 65.42(b)(5)]
- 5 [40 CFR 65.47(b)] Equipment/operational data recordkeeping by electronic or hard copy once initially. Keep readily accessible records showing the dimensions of the storage vessel and an analysis of the capacity of the storage vessel. Keep records as long as the storage vessel is in operation. Subpart C. [40 CFR 65.47(b)]

CRG 0004 CRG004 - 99/Oleum/Spent Swing Tanks

Group Members: EQT 0167EQT 0168

- 6 [40 CFR 60.110b(e)] Complies with 40 CFR 60 Subpart Kb by complying with 40 CFR 65 Subparts C and G. Monitoring requirements of 40 CFR 60.116b(c), (e), (f)(1), and (g) still apply. Subpart Kb. [40 CFR 60.110b(e)]
- 7 [40 CFR 65.145(c)(2)] Equipment/operational data monitored by technically sound method at the approved frequency. Monitor the disposition of spent acid tank vent (Sulfuric Acid Unit No. 1 versus APVC). Subpart G. [40 CFR 65.145(c)(2)]
Which Months: All Year Statistical Basis: None specified
- 8 [40 CFR 65.42(b)(5)] Operate and maintain a closed vent system and a control device. Ensure that the control device is designed and operated to reduce inlet emissions of regulated material by 95% or greater, except during periods of planned routine maintenance or during a control system malfunction. Ensure that periods of planned routine maintenance do not exceed 240 hours per year. Subpart C. [40 CFR 65.42(b)(5)]
- 9 [40 CFR 65.47(b)] Equipment/operational data recordkeeping by electronic or hard copy once initially. Keep readily accessible records showing the dimensions of the storage vessel and an analysis of the capacity of the storage vessel. Keep records as long as the storage vessel is in operation. Subpart C. [40 CFR 65.47(b)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Group: PCS 0001 Spent Acid Process

CRG 0004 CRG004 - 99/Oleum/Spent Swing Tanks

- 10 [LAC 33:III.501.C.6] The requirements listed under CRG004 for the 99/Oleum/Spent Swing Tanks (EQT167 & EQT168) only apply when these tanks are in Spent Acid Service.

EQT 0150 26 - Spent Acid Barge Loading Scrubber

- 11 [LAC 33:III.501.C.6] pH monitored by pH instrument once every four hours when barge vent are routed to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 12 [LAC 33:III.501.C.6] The requirements listed for EQT 0150 (Source 26) only apply when portable scrubber Industrial Field Service (IFS) Unit 1 is being used. Permittee may substitute IFS Unit 4 (Permit No. 7777-00314-01) or IFS Unit 6 (Permit No. 7777-00413-00) and follow the monitoring requirements for those scrubbers required by their respective permits. STATE ONLY.
- 13 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 14 [LAC 33:III.501.C.6] pH recordkeeping by electronic or hard copy once every four hours when barge vents are routed to scrubber. STATE ONLY.
- 15 [LAC 33:III.501.C.6] Packed Column Spray Nozzle Pressure \geq 15 psig when barge vents are routed to scrubber. Permittee is allowed one excused excursion per semi-annual period. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 16 [LAC 33:III.501.C.6] Pressure monitored by pressure instrument once every four hours when barge vents are routed to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 17 [LAC 33:III.501.C.6] Pressure recordkeeping by electronic or hard copy once every four hours when barge vents are routed to scrubber. STATE ONLY.
- 18 [LAC 33:III.501.C.6] pH \geq 10 s.u. when barge vents are routed to scrubber. Permittee is allowed one excused excursion per semi-annual period. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 19 [LAC 33:III.5107.A.2] Emits Class III TAP (via process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. STATE ONLY.

EQT 0151 27 - Acid Plant Vapor Combustor

- 20 [40 CFR 65.145(a)] Temperature \geq 1512 F when regulated tanks are venting to the APVC; or VOC, Total \geq 95 % destruction removal efficiency (DRE) when calculated by time-weighted average factoring in the amount of time vented to Sulfuric Acid Unit No. 1 (RLP 014). Subpart G. [40 CFR 65.145(a)]
Which Months: All Year Statistical Basis: Daily average
- 21 [40 CFR 65.145(a)] The owner or operator shall operate and maintain the nonflare control device so that the monitored parameters defined in the monitoring plan remain within the ranges specified in the Initial Compliance Status Report whenever emissions of regulated material are routed to the control device, except during periods of startup, shutdown, and malfunction. Subpart G. [40 CFR 65.145(a)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Group: PCS 0001 Spent Acid Process

EQT 0151 27 - Acid Plant Vapor Combustor

- 22 [40 CFR 65.145(c)(1)] Submit a monitoring plan containing the information in 40 CFR 65.165(b) to identify the parameters that will be monitored to assure proper operation of the control device, unless previously established under an applicable standard prior to the implementation date of 40 CFR 65. Subpart G. [40 CFR 65.145(c)(1)]
- 23 [40 CFR 65.145(c)(2)] Temperature monitored by temperature monitoring device at the approved frequency. Monitor the firebox temperature. Subpart G. [40 CFR 65.145(c)(2)]
Which Months: All Year Statistical Basis: Daily average
- 24 [40 CFR 65.163] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 65.163(a) through (e), as applicable. Subpart G.
- 25 [40 CFR 65.5(c)] Submit Startup, Shutdown, and Malfunction Report: Due by the 30th day following the end of each calendar half (or other calendar reporting period, as appropriate), unless the information is submitted with the periodic report. Include the information specified in 40 CFR 65.6(c)(1) through (c)(4), as appropriate. Subpart A. [40 CFR 65.5(c)]
- 26 [40 CFR 65.5(e)] Submit Periodic Report: Due semiannually, no later than 60 calendar days after the end of each six-month period. Include all information specified in subparts of 40 CFR 65 and in 40 CFR 65.5(f). Subpart A. [40 CFR 65.5(e)]
- 27 [40 CFR 65.6(b)(1)] Develop a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the regulated source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard. Address routine or otherwise predictable CPMS malfunctions. Develop the plan by the regulated source's implementation date as specified in 40 CFR 65.1(f), or for sources referenced from 40 CFR 63 Subpart F, by the compliance date specified in 40 CFR 63 Subpart F. Subpart A. [40 CFR 65.6(b)(1)]
- 28 [LAC 33:III.1101.B] Opacity \leq 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified
- 29 [LAC 33:III.1311.C] Opacity \leq 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: Six-minute average
- 30 [LAC 33:III.5107.A.2] Emits Class III TAP (via this source and process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

EQT 0176 20D120/30D240 - IFS Mix Tank

- 31 [LAC 33:III.2103.A] Each tank, reservoir, or container with a capacity less than 40,000 gallons but more than 250 gallons storing any VOC with a vapor pressure greater than 1.5 psia shall be equipped with a submerged fill pipe or a vapor loss control system.
- 32 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Group: PCS 0001 Spent Acid Process

EQT 0176 20D120/30D240 - IFS Mix Tank

- 33 [LAC 33:III.5107.A.2] Emits Class I and/or Class II and/or Class III TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

EQT 0185 M7 - 001 Wastewater Treatment Unit

- 34 [LAC 33:III.5107.A.2] Emits Class III TAP (via process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

EQT 0277 13 - Acid Plant Caustic Scrubber

- 35 [LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
- 36 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device continuously only when venting to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 37 [LAC 33:III.501.C.6] Flow rate ≥ 315 gallons/min when venting to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 38 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 39 [LAC 33:III.501.C.6] pH recordkeeping by electronic or hard copy once every 15 minutes only when venting to scrubber. STATE ONLY.
- 40 [LAC 33:III.501.C.6] pH monitored by pH instrument continuously only when venting to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 41 [LAC 33:III.501.C.6] pH ≥ 7 s.u. when venting to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 42 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy once every 15 minutes only when venting to scrubber. STATE ONLY.
- 43 [LAC 33:III.905] Install air pollution control facilities whenever practically, economically, and technologically feasible. When facilities have been installed on a property, use them and diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the facilities, even though the ambient air quality standards in affected areas are not exceeded.

FUG 0002 FUG-ACID - Acid Plant Fugitive Emissions

- 44 [40 CFR 65.143(a)(1)] Ensure that each closed vent system is designed and operated to collect the regulated material vapors from the emission point and to route the collected vapors to a control device. Subpart G. [40 CFR 65.143(a)(1)]
- 45 [40 CFR 65.143(a)(2)] Operate closed vent systems at all times when emissions are vented to them. Subpart G. [40 CFR 65.143(a)(2)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Group: PCS 0001 Spent Acid Process

FUG 0002 FUG-ACID - Acid Plant Fugitive Emissions

- 46 [40 CFR 65.143(a)(3)(ii)] Seal or closure mechanism monitored by visual inspection/determination monthly to ensure the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass line. Subpart G. [40 CFR 65.143(a)(3)(ii)]
Which Months: All Year Statistical Basis: None specified
- 47 [40 CFR 65.143(a)(3)(ii)] Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. Subpart G. [40 CFR 65.143(a)(3)(ii)]
- 48 [40 CFR 65.143(b)(1)(i)(A)] Closed vent system (hard piping): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency, as specified in 40 CFR 65.143(c). Subpart G. [40 CFR 65.143(b)(1)(i)(A)]
Which Months: All Year Statistical Basis: None specified
- 49 [40 CFR 65.143(b)(1)(i)(B)] Closed vent system (hard piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart G. [40 CFR 65.143(b)(1)(i)(B)]
Which Months: All Year Statistical Basis: None specified
- 50 [40 CFR 65.143(b)(1)(ii)] Closed vent system (ductwork): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once initially and annually, as specified in 40 CFR 65.143(c). Subpart G. [40 CFR 65.143(b)(1)(ii)]
Which Months: All Year Statistical Basis: None specified
- 51 [40 CFR 65.143(b)(2)(i)] Closed vent system (unsafe to inspect): Determine that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with 40 CFR 65.143(b)(1). Comply with this requirement instead of the requirements in 40 CFR 65.143(b)(1). Subpart G. [40 CFR 65.143(b)(2)(i)]
- 52 [40 CFR 65.143(b)(2)(ii)] Closed vent system (unsafe to inspect): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment as frequently as practicable during safe-to-monitor times but not more frequently than annually. Comply with this requirement instead of the requirements in 40 CFR 65.143(b)(1). Subpart G. [40 CFR 65.143(b)(2)(ii)]
Which Months: All Year Statistical Basis: None specified
- 53 [40 CFR 65.143(b)(3)(i)] Closed vent system (difficult to inspect): Determine that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters (7 feet) above a support surface. Comply with this requirement instead of the requirements in 40 CFR 65.143(b)(1). Subpart G. [40 CFR 65.143(b)(3)(i)]
- 54 [40 CFR 65.143(b)(3)(ii)] Closed vent system (difficult to inspect): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once every five years. Comply with this requirement instead of the requirements in 40 CFR 65.143(b)(1). Subpart G. [40 CFR 65.143(b)(3)(ii)]
Which Months: All Year Statistical Basis: None specified
- 55 [40 CFR 65.143(d)(1)] Closed vent system: Eliminate indications of a leak, or monitor the equipment according to the provisions in 40 CFR 65.143(c), if there are visible, audible or olfactory indications of leaks at the time of the annual visual inspections required by 40 CFR 65.143(b)(1)(i)(B). Subpart G. [40 CFR 65.143(d)(1)]
- 56 [40 CFR 65.143(d)(2)] Closed vent system: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after each leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later, except as specified in 40 CFR 65.143(d)(3). Subpart G. [40 CFR 65.143(d)(2)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Group: PCS 0001 Spent Acid Process

FUG 0002 FUG-ACID - Acid Plant Fugitive Emissions

- 57 [40 CFR 65.143(d)(3)] Closed vent system: Complete repairs as soon as practical, but not later than the end of the next closed vent system shutdown, if repair of a leak is technically infeasible without a closed vent system shutdown, or if it is determined that emissions from immediate repair would be greater than the emissions likely to result from delay of repair. Subpart G. [40 CFR 65.143(d)(3)]
- 58 [40 CFR 65.163] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 65.163(a) through (e), as applicable. Subpart G.
- 59 [LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
- 60 [LAC 33:III.5107.A.2] Emits Class III TAP (via this source and process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

Group: PCS 0002 TS Process

Group Members: ARE 0003 CRG 0001
0001 0002

EQT 0147EQT 0177EQT 0178EQT 0179EQT 0180EQT 0181EQT 0182EQT 0183EQT 0278EQT 0279EQT 0280EQT 0281EQT 0282EQT 0283EQT 0284

FUG 0003 RLP 0013 RLP 0014

ARE 0003 M3 - Treatment Services Sumps

- 61 [LAC 33:III.5107.A.2] Emits Class III TAP (via process group PCS0002), and emits Class I and/or Class II TAP (via process group PCS0002) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

CRG 0001 CRG001 - 40D250, 40D280, and 40D200

Group Members: EQT 0177EQT 0178EQT 0180

- 62 [40 CFR 60.112b(a)(3)(i)] Closed vent system: Design to collect all VOC vapors and gases discharged from the storage vessel. Subpart Kb. [40 CFR 60.112b(a)(3)(i)]
- 63 [40 CFR 60.112b(a)(3)(ii)] VOC, Total \geq 95 % reduction efficiency using a closed vent system and control device. Sulfuric Acid Unit No. 2 serves as the primary control device for these tanks. The TS Vapor Combustor serves as the secondary control device for these tanks. Subpart Kb. [40 CFR 60.112b(a)(3)(ii)]
- 64 [40 CFR 60.116b(b)] Which Months: All Year Statistical Basis: None specified
Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. Keep copies of all records for the life of the source as specified by 40 CFR 60.116b(a). Subpart Kb. [40 CFR 60.116b(b)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Group: PCS 0002 TS Process

CRG 0001 CRG001 - 40D250, 40D280, and 40D200

- 65 [40 CFR 61.343(a)(1)(i)(A)] Fixed roof: Ensure that the cover and all openings are designed to operate with no detectable emissions as indicated by an instrument reading less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h). (Method 21). Subpart FF. [40 CFR 61.343(a)(1)(i)(A)]
- 66 [40 CFR 61.343(a)(1)(i)(B)] Fixed roof: Maintain each opening in a closed, sealed position at all times that waste is in the tank except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair, except as specified in 40 CFR 61.343(a)(1)(i)(C). Subpart FF. [40 CFR 61.343(a)(1)(i)(B)]
- 67 [40 CFR 61.343(a)(1)] Install, operate, and maintain a fixed-roof and closed-vent system that routes all organic vapors vented from the tank to a control device. Subpart FF. [40 CFR 61.343(a)(1)]
- 68 [40 CFR 61.343(c)] Fixed-roof: Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter to ensure that no cracks or gaps occur and that access doors and other openings are closed and gasketed properly. Subpart FF. [40 CFR 61.343(c)]
Which Months: All Year Statistical Basis: None specified
- 69 [40 CFR 61.343(d)] Make first efforts at repair as soon as practicable, but not later than 45 calendar days after a broken seal or gasket or other problem is identified, or when detectable emissions are measured, except as provided in 40 CFR 61.350. Subpart FF. [40 CFR 61.343(d)]
- 70 [40 CFR 61.349(a)(1)(iii)] Closed-vent system: Ensure that all gauging and sampling devices are gas-tight except when gauging or sampling is taking place. Subpart FF. [40 CFR 61.349(a)(1)(iii)]
- 71 [40 CFR 61.355] Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.
- 72 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
- 73 [40 CFR 63.133(a)(2)(i)] Operate and maintain a fixed roof and a closed-vent system that routes the organic hazardous air pollutants vapors vented from the wastewater tank to a control device. Subpart G. [40 CFR 63.133(a)(2)(i)]
- 74 [40 CFR 63.133(b)(1)(i)] Fixed roof: Maintain in accordance with the requirements specified in 40 CFR 63.148, except as provided in 40 CFR 63.133(b)(4). Subpart G. [40 CFR 63.133(b)(1)(i)]
- 75 [40 CFR 63.133(b)(1)(ii)] Fixed roof: Maintain each opening in a closed position at all times that the wastewater tank contains a Group 1 wastewater stream or residual removed from a Group 1 wastewater stream except when it is necessary to use the opening for wastewater sampling, removal, or for equipment inspection, maintenance, or repair. Subpart G. [40 CFR 63.133(b)(1)(ii)]
- 76 [40 CFR 63.133(f)] Equipment/operational data monitored by technically sound method once initially and once every six months. Monitor for improper work practices in accordance with 40 CFR 63.143, except as specified in 40 CFR 63.133(e). Subpart G. [40 CFR 63.133(f)]
Which Months: All Year Statistical Basis: None specified
- 77 [40 CFR 63.133(g)] Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Inspect each wastewater tank for control equipment failures as defined in 40 CFR 63.133(g)(1)(i) through (g)(1)(ix) according to the schedule in 40 CFR 63.133(g)(2) and (g)(3). Subpart G. [40 CFR 63.133(g)]
Which Months: All Year Statistical Basis: None specified
- 78 [40 CFR 63.143(a)] Comply with the inspection requirements in 40 CFR 63 Subpart G Table 11. Subpart G. [40 CFR 63.143(a)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Group: PCS 0002 TS Process

CRG 0001 CRG001 - 40D250, 40D280, and 40D200

- 79 [LAC 33:III.2103.E.1] VOC, Total \geq 95 % control efficiency using a vapor loss control system. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
- 80 [LAC 33:III.2103.E] Which Months: All Year Statistical Basis: None specified
Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place. Routed to Sulfuric Acid Unit No. 2 or TS Vapr Combustor.
- 81 [LAC 33:III.2103.H.2] Determine compliance with LAC 33:III.2103.E using the methods in LAC 33:III.2103.H.2.a-e, where appropriate.
- 82 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

CRG 0002 CRG002 - 40D290, 40D210, 40D300, and 40D220

Group Members: EQT 0179 EQT 0181 EQT 0182 EQT 0183

- 83 [40 CFR 61.343(a)(1)(i)(A)] Fixed roof: Ensure that the cover and all openings are designed to operate with no detectable emissions as indicated by an instrument reading less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h). (Method 21). Subpart FF. [40 CFR 61.343(a)(1)(i)(A)]
- 84 [40 CFR 61.343(a)(1)(i)(B)] Fixed roof: Maintain each opening in a closed, sealed position at all times that waste is in the tank except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair, except as specified in 40 CFR 61.343(a)(1)(i)(C). Subpart FF. [40 CFR 61.343(a)(1)(i)(B)]
- 85 [40 CFR 61.343(a)(1)] Install, operate, and maintain a fixed-roof and closed-vent system that routes all organic vapors vented from the tank to a control device. Subpart FF. [40 CFR 61.343(a)(1)]
- 86 [40 CFR 61.343(c)] Fixed-roof: Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter to ensure that no cracks or gaps occur and that access doors and other openings are closed and gasketed properly. Subpart FF. [40 CFR 61.343(c)]
Which Months: All Year Statistical Basis: None specified
- 87 [40 CFR 61.343(d)] Make first efforts at repair as soon as practicable, but not later than 45 calendar days after a broken seal or gasket or other problem is identified, or when detectable emissions are measured, except as provided in 40 CFR 61.350. Subpart FF. [40 CFR 61.343(d)]
- 88 [40 CFR 61.349(a)(1)(iii)] Closed-vent system: Ensure that all gauging and sampling devices are gas-tight except when gauging or sampling is taking place. Subpart FF. [40 CFR 61.349(a)(1)(iii)]
- 89 [40 CFR 61.355] Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.
- 90 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
- 91 [40 CFR 63.133(a)(1)] Operate and maintain a fixed roof. Subpart G. [40 CFR 63.133(a)(1)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Group: PCS 0002 TS Process

CRG 0002 CRG002 - 40D290, 40D210, 40D300, and 40D220

- 92 [40 CFR 63.133(f)] Equipment/operational data monitored by technically sound method once initially and once every six months. Monitor for improper work practices in accordance with 40 CFR 63.143, except as specified in 40 CFR 63.133(e). Subpart G. [40 CFR 63.133(f)]
Which Months: All Year Statistical Basis: None specified
- 93 [40 CFR 63.133(g)] Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Inspect each wastewater tank for control equipment failures as defined in 40 CFR 63.133(g)(1)(i) through (g)(1)(ix) according to the schedule in 40 CFR 63.133(g)(2) and (g)(3). Subpart G. [40 CFR 63.133(g)]
Which Months: All Year Statistical Basis: None specified
- 94 [40 CFR 63.143(a)] Comply with the inspection requirements in 40 CFR 63 Subpart G Table 11. Subpart G. [40 CFR 63.143(a)]
- 95 [LAC 33:III.2103.A] Each tank, reservoir, or container with a capacity less than 40,000 gallons but more than 250 gallons storing any VOC with a vapor pressure greater than 1.5 psia shall be equipped with a submerged fill pipe or a vapor loss control system.
- 96 [LAC 33:III.2103.H.3] If required, Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 97 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0147 21 - TS Vapor Combustor

- 98 [40 CFR 60.112b(a)(3)(ii)] VOC, Total \geq 95 % reduction efficiency using a closed vent system and control device. Subpart Kb. [40 CFR 60.112b(a)(3)(ii)]
Which Months: All Year Statistical Basis: Three-hour average
- 99 [40 CFR 60.113b(c)(2)] Equipment/operational data monitored by the regulation's specified method(s) at the regulation's specified frequency. Monitor the parameters of the closed vent system and control device in accordance with the operating plan submitted to DEQ in accordance with 40 CFR 60.113b(c)(1) of this section, unless the plan was modified by DEQ during the review process. In this case, the modified plan applies. Therefore, monitor firebox temperature continuously. Subpart Kb. [40 CFR 60.113b(c)(2)]
Which Months: All Year Statistical Basis: None specified
- 100 [40 CFR 60.115b(c)(1)] Operating plan recordkeeping by electronic or hard copy at the approved frequency. Keep copies of all records for the life of the control equipment. Subpart Kb. [40 CFR 60.115b(c)(1)]
- 101 [40 CFR 60.115b(c)(2)] Monitoring data recordkeeping by electronic or hard copy upon measurement in accordance with the operating plan of 40 CFR 60.113b(c)(2). Keep copies of all records for at least two years. Subpart Kb. [40 CFR 60.115b(c)(2)]
- 102 [40 CFR 61.349(a)(2)(i)(C)] Residence time \geq 0.5 sec at a minimum temperature of 760 degrees C (1400 degrees F). Subpart FF. [40 CFR 61.349(a)(2)(i)(C)]
Which Months: All Year Statistical Basis: None specified
- 103 [40 CFR 61.349(f)] Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter. Include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections. Subpart FF. [40 CFR 61.349(f)]
Which Months: All Year Statistical Basis: None specified
- 104 [40 CFR 61.354(c)(1)] Temperature monitored by temperature monitoring device continuously. Install the temperature sensor at a representative location in the combustion chamber. Subpart FF. [40 CFR 61.354(c)(1)]
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Group: PCS 0002 TS Process

EQT 0147 21 - TS Vapor Combustor

- 105 [40 CFR 61.354(c)] Inspect the firebox temperature results daily to ensure proper operation. Subpart FF. [40 CFR 61.354(c)]
- 106 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
- 107 [40 CFR 63.139(b)] Ensure that the control device is operating whenever organic hazardous air pollutants emissions are vented to the control device. Subpart G. [40 CFR 63.139(b)]
- 108 [40 CFR 63.139(c)(1)(iii)] Residence time ≥ 0.5 sec at a minimum temperature of 760 degrees C. The TS Vapor Combustor is the secondary control device for TS tanks that are subject to vapor control per 63.133(a)(2) if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.139(c)(1)(iii)]
- 109 [40 CFR 63.139(d)] Which Months: All Year Statistical Basis: None specified
Demonstrate that each control device or combination of control devices achieves the appropriate conditions specified in 40 CFR 63.139(c) by using one or more of the methods specified in 40 CFR 63.138(d)(1), (d)(2), or (d)(3), except as specified in (d)(4). Subpart G. [40 CFR 63.139(d)]
- 110 [40 CFR 63.143(e)(1)] Comply with the monitoring requirements specified in 40 CFR 63 Subpart G Table 13. Continuously monitor the firebox temperature. Subpart G. [40 CFR 63.143(e)(1)]
- 111 [40 CFR 63.143(g)] The firebox temperature monitoring equipment shall be installed, calibrated, and maintained according to manufacturer's specifications or other written procedures that provide adequate assurance that the equipment will monitor accurately. Subpart G. [40 CFR 63.143(g)]
- 112 [LAC 33:III.1101.B] Opacity ≤ 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
- 113 [LAC 33:III.1311.C] Which Months: All Year Statistical Basis: None specified
Opacity ≤ 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
- 114 [LAC 33:III.1513.C] Which Months: All Year Statistical Basis: Six-minute average
Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
- 115 [LAC 33:III.2103.E.1] VOC, Total ≥ 95 % control efficiency. Vapor loss control system shall be capable of minimum VOC control efficiency of 95%. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
- 116 [LAC 33:III.2103.H.2] Which Months: All Year Statistical Basis: Three-hour average
Determine compliance with LAC 33:III.2103.E using the methods in LAC 33:III.2103.H.2.a-e, where appropriate.
- 117 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 118 [LAC 33:III.5107.A.2] Emits Class III TAP (via this source and process group PCS0002), and emits Class I and/or Class II TAP (via process group PCS0002) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Group: PCS 0002 TS Process

EQT 0278 U1-Scbr - Unit 1 Tail Gas Scrubber

- 119 [LAC 33:III.905] Install air pollution control facilities whenever practically, economically, and technologically feasible. When facilities have been installed on a property, use them and diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the facilities, even though the ambient air quality standards in affected areas are not exceeded.

EQT 0279 U2-Scbr - Unit 2 Tail Gas Scrubber

- 120 [LAC 33:III.905] Install air pollution control facilities whenever practically, economically, and technologically feasible. When facilities have been installed on a property, use them and diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the facilities, even though the ambient air quality standards in affected areas are not exceeded.

EQT 0280 U1-Furn - Unit 1 Furnace

- 121 [40 CFR 61.342(c)(1)(i)] Waste streams containing benzene: Remove or destroy the benzene contained in the waste using a treatment process or wastewater treatment system that complies with the standards specified in 40 CFR 61.348. Subpart FF. [40 CFR 61.342(c)(1)(i)]
- 122 [40 CFR 61.348(e)] Maintain furnace pressure at -0.1 inches of water maximum, 10-second delay. Furnace openings shall operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in §61.355(h). Compliance with this requirement assures compliance with 40 CFR 61.348(e). [40 CFR 61.348(e), LAC 33:III.507.H.1.a]
- 123 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
- 124 [40 CFR 63.138(h)(2)(i)] Treat the wastewater stream or residual in a unit identified in, and complying with, 40 CFR 63.138(h)(1), (h)(2), or (h)(3). Rhodia will comply with (h)(2) which states a boiler or heater that has been issued a final permit under 40 CFR 270 and complies with 40 CFR 266 Subpart H. Subpart G. [40 CFR 63.138(h)(2)(i)]
- 125 [40 CFR 65.145(a)] The owner or operator shall operate and maintain the nonflare control device so that the monitored parameters defined in the monitoring plan remain within the ranges specified in the Initial Compliance Status Report whenever emissions of regulated material are routed to the control device, except during periods of startup, shutdown, and malfunction. Subpart G. [40 CFR 65.145(a)]
- 126 [40 CFR 65.145(c)(1)] Submit a monitoring plan containing the information in 40 CFR 65.165(b) to identify the parameters that will be monitored to assure proper operation of the control device, unless previously established under an applicable standard prior to the implementation date of 40 CFR 65. Subpart G. [40 CFR 65.145(c)(1)]
- 127 [40 CFR 65.145(c)(1)] Temperature \geq 1500 F when spent acid tanks are venting to Sulfuric Acid Unit No. 1. Subpart G. [40 CFR 65.145(c)(1)]
- 128 [40 CFR 65.145(c)(2)] Which Months: All Year Statistical Basis: None specified
- 129 [40 CFR 65.163] The owner or operator shall monitor the parameters specified in the Initial Compliance Status Report or in the operating permit. Therefore, Combustion zone temperature shall be monitored. Records shall be generated as specified in 65.163(b)(1). [40 CFR 65.145(c)(2)]
- Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 65.163(a) through (e), as applicable. Subpart G.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Group: PCS 0002 TS Process

EQT 0280 U1-Furn - Unit 1 Furnace

- 130 [LAC 33:III.1101.B] Opacity \leq 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified

EQT 0281 U2-RFurn - Unit 2 Regen Furnace

- 131 [40 CFR 60.112b(a)(3)(ii)] VOC, Total \geq 95 % reduction efficiency. Subpart Kb. [40 CFR 60.112b(a)(3)(ii)]
Which Months: All Year Statistical Basis: Three-hour average
- 132 [40 CFR 60.113b(c)(2)] Equipment/operational data monitored by the regulation's specified method(s) continuously. Monitor the parameters of the closed vent system and control device in accordance with the operating plan submitted to DEQ in accordance with 40 CFR 60.113b(c)(1) of this section, unless the plan was modified by DEQ during the review process. In this case, the modified plan applies. Therefore, monitor firebox temperature (Regen furnace) continuously. Subpart Kb. [40 CFR 60.113b(c)(2)]
Which Months: All Year Statistical Basis: None specified
- 133 [40 CFR 60.115b(c)(1)] Operating plan recordkeeping by electronic or hard copy at the approved frequency. Keep copies of all records for the life of the control equipment. Subpart Kb. [40 CFR 60.115b(c)(1)]
- 134 [40 CFR 60.115b(c)(2)] Monitoring data recordkeeping by electronic or hard copy upon measurement in accordance with the operating plan of 40 CFR 60.113b(c)(2). Keep copies of all records for at least two years. Subpart Kb. [40 CFR 60.115b(c)(2)]
- 135 [40 CFR 61.342(c)(1)(i)] Waste streams containing benzene: Remove or destroy the benzene contained in the waste using a treatment process or wastewater treatment system that complies with the standards specified in 40 CFR 61.348. Subpart FF. [40 CFR 61.342(c)(1)(i)]
- 136 [40 CFR 61.348(e)] Maintain furnace pressure at -0.1 inches of water maximum, 10-second delay. Furnace openings shall operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in §61.355(h). Compliance with this requirement assures compliance with 40 CFR 61.348(e). [40 CFR 61.348(e), LAC 33:III.507.H.1.a]
- 137 [40 CFR 61.349(a)(2)(i)(C)] Residence time \geq 0.5 sec at a minimum temperature of 760 degrees C (1400 degrees F) in the Regen furnace. Subpart FF. [40 CFR 61.349(a)(2)(i)(C)]
Which Months: All Year Statistical Basis: None specified
- 138 [40 CFR 61.349(f)] Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter. Include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections. Subpart FF. [40 CFR 61.349(f)]
Which Months: All Year Statistical Basis: None specified
- 139 [40 CFR 61.354(c)(5)] Equipment/operational data monitored by technically sound method continuously. Monitor a parameter that indicates good combustion operating practices are being used. Subpart FF. [40 CFR 61.354(c)(5)]
Which Months: All Year Statistical Basis: None specified
- 140 [40 CFR 61.354(c)(5)] Equipment/operational data recordkeeping by recorder continuously. Record a parameter that indicates good combustion operating practices are being used. Subpart FF. [40 CFR 61.354(c)(5)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Group: PCS 0002 TS Process

EQT 0281 U2-RFurn - Unit 2 Regen Furnace

- 141 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
- 142 [40 CFR 63.138(h)(2)(i)] Treat the wastewater stream or residual in a unit identified in, and complying with, 40 CFR 63.138(h)(1), (h)(2), or (h)(3). Rhodia will comply with (h)(2) which states a boiler or heater that has been issued a final permit under 40 CFR 270 and complies with 40 CFR 266 Subpart H. Subpart G. [40 CFR 63.138(h)(2)(i)]
- 143 [40 CFR 63.139(c)(1)(iii)] Route organic hazardous air pollutant emissions to an enclosed combustion device having a minimum Residence time ≥ 0.5 sec at a minimum temperature of 760 degrees C. Unit No. 2 Regen furnace is the primary control device for TS tanks that are subject to vapor control per 63.133(a)(2) if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to us. Per 63.139(d)(4)(iii)(A), this unit is exempt from 63.139(d)(1)-(3) and 63.143. Subpart G. [40 CFR 63.139(c)(1)(iii)]
Which Months: All Year Statistical Basis: None specified
- 144 [LAC 33:III.1101.B] Opacity ≤ 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified
- 145 [LAC 33:III.2103.E.1] VOC, Total ≥ 95 % control efficiency. Vapor loss control system shall be capable of minimum VOC control efficiency of 95% for compliance of all tanks vented to it. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: Three-hour average
- 146 [LAC 33:III.2103.H.2] Determine compliance with LAC 33:III.2103.E using the methods in LAC 33:III.2103.H.2.a-e, where appropriate.
- 147 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0282 U2-SFurn - Unit 2 Sulfur Furnace

- 148 [LAC 33:III.1101.B] Opacity ≤ 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified

EQT 0283 U1-Proc - Unit 1 Process

- 149 [LAC 33:III.1511.E] Sulfuric acid monitored by technically sound method daily. Monitor the H₂SO₄ production rate.
Which Months: All Year Statistical Basis: None specified
- 150 [LAC 33:III.1513.A.3] Sulfuric acid recordkeeping by electronic or hard copy daily. Record the H₂SO₄ production rate.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Group: PCS 0002 TS Process

EQT 0283 U1-Proc - Unit 1 Process

- 151 [LAC 33:III.5109.A.1] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. MACT applies for metals only and therefore is determined to be compliance with the BIF permit.

EQT 0284 U2-Proc - Unit 2 Process

- 152 [LAC 33:III.1511.E] Sulfuric acid monitored by technically sound method daily. Monitor the H₂SO₄ production rate.
Which Months: All Year Statistical Basis: None specified
- 153 [LAC 33:III.1513.A.3] Sulfuric acid recordkeeping by electronic or hard copy daily. Record the H₂SO₄ production rate.
- 154 [LAC 33:III.5109.A.1] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. MACT applies for metals only and therefore is determined to be compliance with the BIF permit.

FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

- 155 [40 CFR 60.112b(a)(3)(i)] Closed vent system (no detectable emissions): VOC, Total < 500 ppm above background as indicated by instrument readings and visual inspections, as determined in Subpart VV, 40 CFR 60.485(c). Subpart Kb. [40 CFR 60.112b(a)(3)(i)]
Which Months: All Year Statistical Basis: None specified
- 156 [40 CFR 60.112b(a)(3)] Equip with a closed vent system and control device. Design the closed vent system to collect all VOC vapors and gases discharged from the storage vessel and operate with no detectable emissions. Subpart Kb. [40 CFR 60.112b(a)(3)]
- 157 [40 CFR 61.343(a)(1)(i)(A)] Fixed roof: Ensure that the cover and all openings are designed to operate with no detectable emissions as indicated by an instrument reading less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h). Subpart FF. [40 CFR 61.343(a)(1)(i)(A)]
- 158 [40 CFR 61.345(a)(1)] Install, operate, and maintain a cover on each container used to handle, transfer, or store waste. Subpart FF. [40 CFR 61.345(a)(1)]
- 159 [40 CFR 61.348(e)(3)ii] If the cover and closed-vent system operates such that the treatment process and wastewater treatment system unit are maintained at a pressure less than atmospheric pressure, the owner or operator may operate the system with an opening that is not sealed and kept closed at all times provided the opening is designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 61.355(h). Subpart FF. [40 CFR 61.348(e)(3)ii]
- 160 [40 CFR 61.349(a)(1)(i)] Closed-vent system: Operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h). Subpart FF. [40 CFR 61.349(a)(1)(i)]
- 161 [40 CFR 61.349(f)] Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter. Include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections. Subpart FF. [40 CFR 61.349(f)]
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Group: PCS 0002 TS Process

FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

- 162 [40 CFR 61.354(f)(1)] Closed-vent system (bypass line): Seal or closure mechanism monitored by visual inspection/determination monthly. Check the position of the valve and the condition of the car-seal or closure mechanism required under 40 CFR 61.349(a)(1)(ii) to ensure that the valve is maintained in the closed position and the vent stream is not diverted through the bypass line. Subpart FF. [40 CFR 61.354(f)(1)]
Which Months: All Year Statistical Basis: None specified
- 163 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
- 164 [40 CFR 63.148(c)(1)] Conduct initial inspection of closed vent system on TS tanks in accordance with Method 21 as specified in 40 CFR 63.148(c)(1). Conduct annual inspection for visible, audible, or olfactory indications of leaks. This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(c)(1)]
- 165 [40 CFR 63.148(f)(2)] Vapor collection system or closed vent system (bypass lines): Seal or closure mechanism monitored by visual inspection/determination monthly to ensure the valve is maintained in the closed position and the vent stream is not diverted through the bypass line. This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(f)(2)]
Which Months: All Year Statistical Basis: None specified
- 166 [40 CFR 63.148(f)(2)] Vapor collection system or closed vent system (bypass lines): Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(f)(2)]
- 167 [40 CFR 63.148(i)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.148(i)(1) through (i)(6). This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(i)]
- 168 [40 CFR 63.148(j)] Submit the information specified in 40 CFR 63.148(j)(1) through (j)(3) with the reports required by 40 CFR 63.182(b) of subpart H or 40 CFR 63.152(c). This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(j)]
- 169 [LAC 33:III.501] Comply with 40 CFR 264 BB and 40 CFR 61 Subpart V by implementing the Louisiana Consolidated Fugitive Emission Program Guidelines. Compliance is achieved through compliance with LA MACT Determination for nonHON Sources.
- 170 [LAC 33:III.5107.A.2] Emits Class III TAP (via process group PCS0002), and emits Class I and/or Class II TAP (via process group PCS0002) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
- 171 [LAC 33:III.5109.A] VOC, Total monitored by technically sound method within 90 days of placing equipment back in service that had been physically removed from service, disassembled or dismantled to determine if it is leaking, as specified in Subsection C.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Group: PCS 0002 TS Process

FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

- 172 [LAC 33:III.5109.A] Pressure relief device in gas/vapor service: VOC, Total < 500 ppm except during pressure releases, as measured by the method specified in Section P.3, as specified in Section F.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
Which Months: All Year Statistical Basis: None specified
- 173 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service (percent leaking valves ≤ 2 for two consecutive semiannual leak detection periods): VOC, Total monitored by the regulation's specified method(s) annually, as specified in Paragraph J.2.b of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Monitor using the method specified in Section P. If the percentage of valves leaking is greater than 2 for any monitoring period, comply with the requirements as described in Section I, as specified in Paragraph J.2.c of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Optional alternative to quarterly monitoring.
Which Months: All Year Statistical Basis: None specified
- 174 [LAC 33:III.5109.A] Comply with the test methods and procedures in Section P, as specified in Subsections P.1 through P.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 175 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service (opened or otherwise had the seal broken): VOC, Total monitored by the regulation's specified method(s) within 90 days after being returned to VOTAP service. Monitor each connector that has been opened or has otherwise had the seal broken, including those determined to be unrepairable prior to process unit shutdown, as specified in Paragraph O.8.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Section P. If the follow-up monitoring detects a leak, initiate repair provisions specified in Subsection O.9, unless it is determined to be unrepairable, in which case it is counted as unrepairable.
Which Months: All Year Statistical Basis: None specified
- 176 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Ensure that the barrier fluid is not in VOTAP service and, if the pump is covered by standards under NSPS, is not in VOC service, as specified in Paragraph D.4.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
- 177 [LAC 33:III.5109.A] Delay of Repair: Repair equipment before the end of the next process unit shutdown, if repair is technically infeasible without a process unit shutdown, as specified in Subsection M.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 178 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Equip each barrier fluid system with a sensor that will detect failure of the seal system, the barrier fluid system, or both, as specified in Paragraph D.4.c of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
- 179 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service (welded completely around the circumference of the interface or physically removed and the pipe welded together): Equipment/operational data monitored by the regulation's specified method(s) within three months after being welded. Check the integrity of the weld by monitoring according to the procedures in Section P or by testing using x-ray, acoustic monitoring, hydrotesting, or other applicable method, as specified in Subsection O.7 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection O.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Group: PCS 0002 TS Process

FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

- 180 [LAC 33:III.5109.A] Instrument systems and pressure relief devices in liquid service; and pumps, valves, connectors, and agitators in heavy liquid service: VOC, Total monitored by the regulation's specified method(s) within 5 days of finding evidence of a potential leak by visual, audible, olfactory, or any other detection method, as specified in Section K.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.2. If an instrument reading of 10000 ppm or greater for agitators, 2000 ppm or greater for pumps or 1000 ppm or greater for valves, connectors, instrument systems, or pressure relief devices is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection K.3.
Which Months: All Year Statistical Basis: None specified
- 181 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service: Repair Leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Subsection O.8. Make a first attempt at repair no later than 5 calendar days after each leak is detected. If a leak is detected, monitor the for leaks within the first 90 days after its repair, as specified in Subsection O.9 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 182 [LAC 33:III.5109.A] Pressure relief device in gas/vapor service: After each pressure release, return to a condition of no leakage, as indicated by an instrument reading of less than 500 ppm, as soon as practicable, but no later than five calendar days after each pressure release, except as provided in Section M, as specified in Section F.2.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 183 [LAC 33:III.5109.A] Identify each piece of equipment in a process unit subject to this MACT determination such that it can be distinguished readily from equipment that is not subject to this MACT determination, as specified in Subsection C.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 184 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service (skip period leak detection and repair): Notify DEQ 30 days before implementing any of the alternate provisions of Section J, as specified in Subsection R.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 185 [LAC 33:III.5109.A] Sampling connection systems: Equip with a closed-purge system or closed-vent system, except as provided for in Section C, as specified in Subsection G.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Ensure that this system collects or captures the sample purge for return to the process.
- 186 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service (percent of leaking connectors > 2): VOC, Total monitored by the regulation's specified method(s) quarterly until good performance is obtained or until four quarterly monitorings have been performed, as specified in Subsections O.2 and O.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If good performance has not been obtained after four quarters of monitoring, monitor the remaining unchecked connectors within six months of the last quarterly monitoring period, as specified in Subsection O.6 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If monitoring of the remaining connectors indicates good performance, monitor in accordance with Subsection O.4. If monitoring of the remaining connectors indicates that good performance has not been obtained, monitor in accordance with Subsection O.5. Monitor using the method specified in Section P. If an instrument reading \geq 1000 ppm is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection O.9, except as provided in Section M.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Group: PCS 0002 TS Process

FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

- 187 [LAC 33:III.5109.A] Pumps in light liquid service: Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection D.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.
- 188 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service: Calculate the percent leaking connectors using the equation in Subsection O.12 for use in determining the monitoring frequency, as specified in Subsection O.12 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 189 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar), as specified in Paragraph D.4.d of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate repair provisions specified in Paragraphs D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1.
Which Months: All Year Statistical Basis: None specified
- 190 [LAC 33:III.5109.A] Pumps in light liquid service: VOC, Total monitored by the regulation's specified method(s) quarterly. Monitor to detect leaks using the methods specified in Subsection P.2, except as provided in Subsection C.4 and Subsections D.4, D.5, and D.6, as specified in Paragraph D.1.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If an instrument reading of 2000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate repair provisions as specified in Subsection D.3.
Which Months: All Year Statistical Basis: None specified
- 191 [LAC 33:III.5109.A] Instrument systems and pressure relief devices in liquid service; and pumps, valves, connectors, and agitators in heavy liquid service: Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection K.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.
- 192 [LAC 33:III.5109.A] Submit report: Due semiannually starting six months after the initial report required in Subsection R.1. Include the information specified in Paragraphs R.2.a through R.2.e, as specified in Subsection R.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 193 [LAC 33:III.5109.A] Open-ended valves or lines: Monitor and repair in accordance with Section I, as specified in Subsection H.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 194 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Equipment/operational data monitored by visual inspection/determination daily, if pump is in service. Check sensor daily or equip with an audible alarm, as specified in Subparagraph D.4.e.i of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criterion determined in Paragraph D.4.e.ii, a leak is detected. If a leak is detected, initiate repair provisions specified in Paragraphs D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Group: PCS 0002 TS Process

FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

- 195 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service (difficult-to-monitor): VOC, Total monitored by the regulation's specified method(s) at the regulation's specified frequency. Maintain a written plan that requires monitoring of the valve at least once per calendar year, as specified in Subsection I.6.c of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.2. Comply with this requirement instead of the requirements in Subsection I.1.
Which Months: All Year Statistical Basis: None specified
- 196 [LAC 33:III.5109.A] VOC, Total recordkeeping by logbook within 90 days of placing equipment back in service that had been physically removed from service, disassembled or dismantled. Maintain records as required in Subsection Q.5, as specified in Subsection C.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 197 [LAC 33:III.5109.A] Open-ended valves or lines: Equip with a cap, blind flange, plug, or a second valve that seals the open end at all times except during operations requiring process fluid flow through the open-ended valve or line or during maintenance and repair, as specified in Subsection H.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 198 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service (percent of leaking connectors ≤ 2): VOC, Total monitored by the regulation's specified method(s) annually, as specified in Subsections O.2 and O.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Annual monitoring shall be performed per the Louisiana Fugitive Emission Program Consolidation Guidelines which states as once every four quarters. Monitor using the method specified in Section P. If an instrument reading ≥ 1000 ppm is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection O.9, except as provided in Section M.
Which Months: All Year Statistical Basis: None specified
- 199 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar), if pump is in service, as specified in Paragraph D.4.d of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate repair provisions specified in Paragraphs D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1.
Which Months: All Year Statistical Basis: None specified
- 200 [LAC 33:III.5109.A] Pressure relief device in gas/vapor service: VOC, Total monitored by the regulation's specified method(s) within 5 days (calendar) after the pressure release to confirm the condition of no leakage, as indicated by an instrument reading of less than 500 ppm above background, as specified in Section F.2.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.3.
Which Months: All Year Statistical Basis: None specified
- 201 [LAC 33:III.5109.A] Open-ended valves or lines (equipped with a second valve): Operate in a manner such that the valve on the process fluid end is closed before the second valve is closed, as specified in Subsection H.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 202 [LAC 33:III.5109.A] Sampling connection systems (closed-purge or closed-vent system): Return the purged process fluid directly to the process line with zero VOTAP emissions to the atmosphere, or collect and recycle the purged process fluid with zero VOTAP emissions to the atmosphere, or be designed and operated to capture and transport all the purged process fluid to a control device that complies with the requirements of Section N, as specified in Subsection G.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

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Air - Title V Regular Permit Major Mod

Group: PCS 0002 TS Process

FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

- 203 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service (difficult-to-monitor): Demonstrate that the valve cannot be monitored without elevating the monitoring personnel more than two meters above a support service, as specified in Subsection I.6.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection I.1.
- 204 [LAC 33:III.5109.A] Attach a weatherproof and readily visible identification, marked with the equipment identification, to leaking equipment, as specified in Subsection Q.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 205 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both, as specified in Subparagraph D.4.e.ii of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
- 206 [LAC 33:III.5109.A] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in Subsections Q.1 through Q.13 as applicable, as specified in Section Q of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 207 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service (percent leaking valves ≥ 4): VOC, Total monitored by the regulation's specified method(s) monthly, as specified in Subsection I.7 of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Monitor using the method specified in Subsection P.2. Initiate monthly monitoring within 60 days of the previous monitoring and continue until the percent of leaking valves is less than 4, at which time monitoring can be performed in accordance with Subsection I.1.
Which Months: All Year Statistical Basis: None specified
- 208 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service: Repair leaks as soon as practicable, but no later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection I.3 and I.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.
- 209 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure, or equip with a barrier fluid degassing reservoir that is connected by a closed-vent system to a control device that complies with the requirements of Section N, or equip with a system that purges the barrier fluid into a process stream with zero VOTAP emissions to the atmosphere, as specified in Paragraph D.4.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.

RLP 0013 2 - Sulfuric Acid Unit No. 2

- 210 [40 CFR 60.83(a)(1)] Acid mist ≤ 0.15 lb/ton (0.075 kg/metric ton) of acid produced, expressed as H₂SO₄, the production being expressed as 100% H₂SO₄.
Subpart H. [40 CFR 60.83(a)(1)]
Which Months: All Year Statistical Basis: None specified
- 211 [40 CFR 60.83(a)(2)] Opacity < 10 percent. Subpart H. [40 CFR 60.83(a)(2)]
Which Months: All Year Statistical Basis: None specified
- 212 [40 CFR 60.85(a)] Use as reference methods and procedures the test methods in 40 CFR 60 Appendix A or other methods and procedures as specified in 40 CFR 60.85, except as provided in 40 CFR 60.8(b), in conducting the performance tests required in 40 CFR 60.8. Subpart H. [40 CFR 60.85(a)]
- 213 [40 CFR 60.85(b)] Determine compliance with the SO₂, acid mist, and visible emission standards in 40 CFR 60.82 and 60.83 using the test methods and procedures specified in 40 CFR 60.85(b) and (c), as applicable. Subpart H. [40 CFR 60.85(b)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

Group: PCS 0002 TS Process

RLP 0013 2 - Sulfuric Acid Unit No. 2

- 214 [40 CFR 60.Subpart H] Rhodia shall comply with the reporting requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A, Subpart H, Appendix B and Appendix F.
- 215 [40 CFR 60.Subpart H] Shall meet a limit of 3.0 lbs SO₂/ton, expressed as lbs. of SO₂ emissions per ton of 100% sulfuric acid produced, averaged over each rolling 3-hour period. This limit does not apply during periods of Startup, Shutdown or Malfunction. For the purposes of this requirement, startup and shutdown are defined as follows. Startup is the 24-hour period when the sulfur-bearing feed starts after a main gas blower shutdown. Shutdown is the stopping of operation for any reason, beginning at the time sulfur-bearing feeds (except for natural gas and fuel oil) to the furnace cease.
- 216 [40 CFR 60.Subpart H] Rhodia shall comply with the recordkeeping requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A, Subpart H and Appendix F.
- 217 [40 CFR 60.Subpart H] Shall meet a 365-day rolling average limit of 2.2 lbs. of SO₂ per ton of 100% sulfuric acid produced, averaged over all operating hours in a rolling 365-day period. This limit applies at all times, including periods of startup, shutdown and malfunction. Operating hours are defined as all periods when sulfur-bearing compounds, except natural gas and fuel oil, are fed to the furnace. (Commence monitoring on January 1, 2011 and demonstrate compliance by January 1, 2012.)
Which months: All year Statistical Basis: 365-day rolling average.
- 218 [40 CFR 60.Subpart H] Rhodia shall comply with the monitoring requirements for SO₂ set forth in 40 CFR 60 Subpart A, Subpart H, Appendix B, and Appendix F, except where superseded by the Alternative Monitoring Plan approved by EPA and LDEQ on July 23, 2007.
- 219 [LAC 33:III.501.C.6] Rhodia shall install continuous emission monitors (CEMs) for NO_x as part of the debottlenecking project. STATE ONLY.
- 220 [LAC 33:III.5107.A.2] Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

RLP 0014 3 - Sulfuric Acid Unit No. 1

- 221 [40 CFR 60.83(a)(1)] Acid mist \leq 0.15 lb/ton (0.075 kg/metric ton) of acid produced, expressed as H₂SO₄, the production being expressed as 100% H₂SO₄.
Subpart H. [40 CFR 60.83(a)(1)]
Which Months: All Year Statistical Basis: None specified
- 222 [40 CFR 60.83(a)(2)] Opacity < 10 percent. Subpart H. Effective starting on May 1, 2012. [40 CFR 60.83(a)(2)]
Which Months: All Year Statistical Basis: None specified
- 223 [40 CFR 60.85(a)] Effective May 1, 2012, use as reference methods and procedures the test methods in 40 CFR 60 Appendix A or other methods and procedures as specified in 40 CFR 60.85, except as provided in 40 CFR 60.8(b), in conducting the performance tests required in 40 CFR 60.8. Subpart H. [40 CFR 60.85(a)]
- 224 [40 CFR 60.85(b)] Effective May 1, 2012, determine compliance with the SO₂, acid mist, and visible emission standards in 40 CFR 60.82 and 60.83 using the test methods and procedures specified in 40 CFR 60.85(b) and (c), as applicable. Subpart H. [40 CFR 60.85(b)]
- 225 [40 CFR 60.Subpart H] Effective May 1, 2012, Rhodia will comply with the reporting requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A, Subpart H, Appendix B and Appendix F.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

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Group: PCS 0002 TS Process

RLP 0014 3 - Sulfuric Acid Unit No. 1

- 226 [40 CFR 60.Subpart H] Effective May 1, 2012, meet a 365-day rolling average limit of 1.9 lbs. of SO₂ per ton of 100% sulfuric acid produced, averaged over all operating hours in a rolling 365-day period. This limit applies at all times, including periods of startup, shutdown and malfunction. Operating hours are defined as all periods when sulfur-bearing compounds, except natural gas and fuel oil, are fed to the furnace. (Commence monitoring on May 1, 2012 and demonstrate compliance by May 1, 2013.)
Which months: All year Statistical Basis: 365-day rolling average.
- 227 [40 CFR 60.Subpart H] Conduct a SO₂ Performance Test by August 29, 2012, to demonstrate compliance with the 3-hour average SO₂ emissions limit. Such test must consist of at least 9 runs and be conducted pursuant to 40 CFR Part 60, Appendix A, Reference Method 8 and Appendix B, Performance Specification 2. This can serve as the CEMS relative accuracy test required under Performance Specification 2, and as applicable, the required NSPS performance test under 40 CFR 60.8.
- 228 [40 CFR 60.Subpart H] Effective May 1, 2012, Rhodia will comply with the monitoring requirements for SO₂ set forth in 40 CFR 60 Subpart A, Subpart H, Appendix B, and Appendix F, except where superseded by the Alternative Monitoring Plan approved by EPA and LDEQ on July 23, 2007.
- 229 [40 CFR 60.Subpart H] Effective May 1, 2012, Rhodia will comply with the recordkeeping requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A, Subpart H and Appendix F.
- 230 [40 CFR 60.Subpart H] Effective May 1, 2012, meet a limit of 3.0 lbs SO₂/ton, expressed as lbs. of SO₂ emissions per ton of 100% sulfuric acid produced, averaged over each rolling 3-hour period. This limit does not apply during periods of Startup, Shutdown or Malfunction. For the purposes of this requirement, startup and shutdown are defined as follows. Startup is the 24-hour period when the sulfur-bearing feed starts after a main gas blower shutdown. Shutdown is the stopping of operation for any reason, beginning at the time sulfur-bearing feeds (except for natural gas and fuel oil) to the furnace cease.
- 231 [LAC 33:III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. This requirement applies from the effective date until April 30, 2012.
Which Months: All Year Statistical Basis: Six-minute average
- 232 [LAC 33:III.1503.A.1] Sulfur dioxide <= 2000 ppmv. This requirement applies from the effective date until April 30, 2012.
Which Months: All Year Statistical Basis: Three-hour average
- 233 [LAC 33:III.1503.D.1] Determine compliance with the appropriate emission limitation in LAC 33:III.1503.A through 1503.C using the methods listed in LAC 33:III.1503.D.Table 4 or any such equivalent method as may be approved by DEQ. Use these methods for initial compliance determinations and for any additional compliance determinations as requested by DEQ. This requirement applies from the effective date until April 30, 2012.

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AI ID: 1314 - Rhodia Inc

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Group: PCS 0002 TS Process

RLP 0014 3 - Sulfuric Acid Unit No. 1

- 234 [LAC 33:III.1511.A] Sulfur dioxide monitored by continuous emission monitor (CEM) continuously, except as specified in LAC 33:III.1511.C and 1511.D. Ensure that the measurement system is certified according to Performance Specification 2 of 40 CFR 60, Appendix B, and quality assured by the procedures in 40 CFR 60, Appendix F. Prior to May 1, 2012, Minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time. Up to 20 minutes per day for calibration will not be counted against the 90% data capture. If the analyzer is out for more than one hour, an alternate method is needed to ensure that concentration and lb/hr limits are met. As such, Rhodia will reduce the acid production rate to 425 ton/day or conduct Reich tests at one hour intervals. Normal waste fuel feed rates may continue. If the analyzer is out for >3 days in a month, the continuous monitoring requirement can be satisfied by increasing Reich testing frequency to 15 min intervals until the analyzer is back in service. If a spare analyzer is installed, a cylinder gas audit will be conducted on the spare analyzer prior to being put into service. RATA testing will continue using the same schedule as for the analyzer that was replaced. This requirement applies from the effective date until April 30, 2012. On and after May 1, 2012, Comply with Alternative Monitoring Plan per Consent Decree.
Which Months: All Year Statistical Basis: None specified
- 235 [LAC 33:III.1513.A.1] Sulfur dioxide recordkeeping by continuous emission monitor (CEM) continuously. This requirement applies from the effective date until April 30, 2012.
- 236 [LAC 33:III.1513.A.2] Submit compliance determination results: Due no later than 90 days after completion of test. This requirement applies from the effective date until April 30, 2012.
- 237 [LAC 33:III.1513.A.2] Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence. Record the initial and additional compliance determination data. This requirement applies from the effective date until April 30, 2012.
- 238 [LAC 33:III.1513.E] Submit excess emissions report: Due quarterly in accordance with LAC 33:I.Chapter 39. Submit reports of three-hour excess emissions and reports of emergency conditions. This requirement applies from the effective date until April 30, 2012.
- 239 [LAC 33:III.1513.E] Make all compliance data available to a representative of DEQ or the U.S. EPA on request. This requirement applies from the effective date until April 30, 2012.
- 240 [LAC 33:III.1513.E] Submit report: Due annually, by the 31st of March, in accordance with LAC 33:III.918. Report data required to demonstrate compliance with the provisions of LAC 33:III.Chapter 15. This requirement applies from the effective date until April 30, 2012.
- 241 [LAC 33:III.501.C.6] Rhodia shall install continuous emission monitors (CEMs) for NOx as part of the debottlenecking project. STATE ONLY.
- 242 [LAC 33:III.5107.A.2] Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

EQT 0140 10 - Preheater; Acit Unit No. 1

- 243 [LAC 33:III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified
- 244 [LAC 33:III.1313.C] Total suspended particulate <= 0.6 lb/MMBTU of heat input.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

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EQT 0140 10 - Preheater; Acit Unit No. 1

- 245 [LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

EQT 0141 11 - Lime Silos

- 246 [LAC 33:III.1311.B] Total suspended particulate ≤ 32.95 lb/hr using a max hourly operating rate throughput of 22.5 tons/hr. The rate of emission shall be the total of all emission points from the source.
Which Months: All Year Statistical Basis: None specified
- 247 [LAC 33:III.1311.C] Opacity ≤ 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: Six-minute average

EQT 0142 12 - Oleum Loading Vent Scrubber

- 248 [LAC 33:III.501.C.6] Scrubber Flow rate ≥ 50 gallons/min. Based on a four-hour block average. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. During periods of planned routine maintenance on the scrubber, the oleum tank and loading vents will either be routed to the process or to a backup portable scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 249 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy once every four hours. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. STATE ONLY.
- 250 [LAC 33:III.501.C.6] Maximum scrubber solution strength of Sulfuric acid ≤ 20 percent. Maximum acid strength of 20%, based on a weekly sample. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. During periods of planned routine maintenance on the scrubber, the oleum tank and loading vents will either be routed to the process or to a backup portable scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: Weekly maximum
- 251 [LAC 33:III.501.C.6] Maximum scrubber solution strength of Sulfuric acid recordkeeping by electronic or hard copy weekly. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. STATE ONLY.
- 252 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 253 [LAC 33:III.501.C.6] Maximum scrubber solution strength of Sulfuric acid monitored by product sampling weekly. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: Weekly maximum
- 254 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device once every four hours. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: None specified

EQT 0146 20 - Sulfur Feed Tank

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

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EQT 0146 20 - Sulfur Feed Tank

- 255 [LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

EQT 0149 24 - Oleum Barge Loading Scrubber

- 256 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device once every four hours when barge vents are routed to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 257 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy once every four hours when barge vents are routed to scrubber. STATE ONLY.
- 258 [LAC 33:III.501.C.6] Scrubber water must be replaced after every two barges loaded. STATE ONLY.
- 259 [LAC 33:III.501.C.6] Flow rate \geq 15 gallons/min when barge vents are routed to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 260 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.

EQT 0152 28 - Gasoline Storage Tank

- 261 [LAC 33:III.2103.A] Each tank, reservoir, or container with a capacity less than 40,000 gallons but more than 250 gallons storing any VOC with a vapor pressure greater than 1.5 psia shall be equipped with a submerged fill pipe or a vapor loss control system.
- 262 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0153 6-90 - Package Boiler

- 263 [40 CFR 60.44b(a)] Nitrogen oxides \leq 0.1 lb/MMBTU heat input (expressed as NO₂), except as provided in 40 CFR 60.44b(k). The nitrogen oxide standards apply at all times, including periods of startup, shutdown, or malfunction. Subpart Db. [40 CFR 60.44b(a)]
Which Months: All Year Statistical Basis: Thirty-day rolling average
- 264 [40 CFR 60.46b(c)] Determine compliance with the NO_x standards in 40 CFR 60.44b through performance testing under 40 CFR 60.46b(e) or (f), or under 40 CFR 60.46b(g) or (h), as applicable. Subpart Db. [40 CFR 60.46b(c)]
- 265 [40 CFR 60.48b(b)(1)] Oxygen or Carbon dioxide recordkeeping by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(b)(1)]
- 266 [40 CFR 60.48b(b)(1)] Nitrogen oxides monitored by CMS continuously. Calculate nitrogen oxides emission rates as specified in 40 CFR 60.48b(d), except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(b)(1)]
Which Months: All Year Statistical Basis: One-hour average
- 267 [40 CFR 60.48b(b)(1)] Nitrogen oxides recordkeeping by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(b)(1)]
- 268 [40 CFR 60.48b(b)(1)] Oxygen or Carbon dioxide monitored by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(b)(1)]
Which Months: All Year Statistical Basis: One-hour average

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EQT 0153 6-90 - Package Boiler

- 269 [40 CFR 60.48b(c)] Operate NOx continuous monitoring systems and record data during all periods of operation except for continuous monitoring system breakdowns and repairs. Record data during calibration checks, and zero and span adjustments. Subpart Db. [40 CFR 60.48b(c)]
- 270 [40 CFR 60.48b(e)] Nitrogen oxides: Follow the procedures under 40 CFR 60.13 and 40 CFR 60.48b(e)(1) through (e)(3) for installation, evaluation, and operation of the NOx continuous monitoring system. Subpart Db. [40 CFR 60.48b(e)]
- 271 [40 CFR 60.48b(f)] When nitrogen oxides emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks and zero and span adjustments, obtain emission data by using standby monitoring systems, 40 CFR 60, Appendix A, Method 7, Method 7a, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days. Subpart Db. [40 CFR 60.48b(f)]
- 272 [40 CFR 60.48b(g)] Comply with the provisions of 40 CFR 60.48b(b), (c), (d), (e)(2), (e)(3), and (f), or monitor steam generating unit operating conditions and predict nitrogen oxides emission rates as specified in a plan submitted pursuant to 60.49b(c). Subpart Db. [40 CFR 60.48b(g)]
- 273 [40 CFR 60.49b(b)] Submit the performance test data from the initial performance test and the performance evaluation of the CEMS using the applicable performance specifications in 40 CFR 60 Appendix B to DEQ. Subpart Db. [40 CFR 60.49b(b)]
- 274 [40 CFR 60.49b(d)] Fuel rate recordkeeping by electronic or hard copy daily. Record the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for coal, distillate oil, residual oil, natural gas, wood, and municipal-type solid waste for the reporting period. Determine the annual capacity factor on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. Subpart Db. [40 CFR 60.49b(d)]
- 275 [40 CFR 60.49b(g)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records of the information listed in 40 CFR 60.49b(g)(1) through (g)(10) for each steam generating unit operating day, except as provided under 40 CFR 60.49b(p). Subpart Db. [40 CFR 60.49b(g)]
- 276 [40 CFR 60.49b(h)] Submit excess emissions report: Due by the 30th day following the end of each six-month period. Report any excess emissions which occurred during the reporting period. Subpart Db. [40 CFR 60.49b(h)]
- 277 [40 CFR 60.49b(i)] Submit reports containing the nitrogen dioxide emission rate information recorded under 40 CFR 60.49b(g). Subpart Db. [40 CFR 60.49b(i)]
- 278 [40 CFR 60.Subpart Db] The permit specific requirements pertaining to NOx and O2 CEMs become effective upon installation of the NOx analyzer in 1H2010.
- 279 [40 CFR 60.Subpart Db] The permit specific requirements pertaining to the 30-day performance test per 40 CFR 60.46b(e) become effective upon installation of the NOx CEMs in 1H2010.
- 280 [LAC 33:III.1101.B] Opacity \leq 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified
- 281 [LAC 33:III.1313.C] Total suspended particulate \leq 0.6 lb/MMBTU of heat input.
Which Months: All Year Statistical Basis: None specified
- 282 [LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

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EQT 0153 6-90 - Package Boiler

- 283 [LAC 33:III.507.H.1.a] Nitrogen oxides: When NO_x emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments, obtain emissions data by using a DEQ-approved monitoring plan per 40 CFR 60.49b(c) to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.

EQT 0186 1-06 - Rental Boiler

- 284 [40 CFR 60.44b(k)] Limit boiler operation to an annual capacity factor of 10 percent or less for natural gas. [40 CFR 60.44b(k)]
- 285 [40 CFR 60.49b(b)] Submit the maximum heat input capacity data from the demonstration of the maximum heat input capacity of the affected facility to DEQ. Subpart Db. [40 CFR 60.49b(b)]
- 286 [40 CFR 60.49b(d)(2)] Record and maintain records of the amount of each fuel combusted during each calendar month. [40 CFR 60.49b(d)(2)]
- 287 [40 CFR 60.49b(p)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records of the calendar date, the number of hours of operation, and the hourly steam load for each steam generating unit operating day. Subpart Db. [40 CFR 60.49b(p)]
- 288 [40 CFR 60.49b(q)] Submit a report to DEQ containing the annual capacity factor over the previous 12 months, the average fuel nitrogen content during the reporting period if residual oil was fired, and all other applicable information per 40 CFR 60.49b(q)(1) through (q)(3). Subpart Db. [40 CFR 60.49b(q)]
- 289 [40 CFR 60.49b] Report information specified in 40 CFR 60.49b(d); (o); (p); (q) and (w). Semi-annual reporting.
- 290 [LAC 33:III.1101.B] Opacity ≤ 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: None specified
- 291 [LAC 33:III.1313.C] Total suspended particulate ≤ 0.6 lb/MMBTU of heat input.
Which Months: All Year Statistical Basis: None specified
- 292 [LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

EQT 0291 M10 - Diesel Fire-Water Pump

- 293 [40 CFR 63.6603(a)] Equipment/operational data monitored by visual inspection/determination annually or every 1,000 hours of operation, whichever comes first. Inspect air cleaner. Subpart ZZZZ. [40 CFR 63.6603(a)]
Which Months: All Year Statistical Basis: None specified
- 294 [40 CFR 63.6603(a)] Equipment/operational data monitored by visual inspection/determination annually or every 500 hours of operation, whichever comes first. Inspect all hoses and belts, and replace as necessary. Subpart ZZZZ. [40 CFR 63.6603(a)]
Which Months: All Year Statistical Basis: None specified
- 295 [40 CFR 63.6603(a)] Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. Subpart ZZZZ. [40 CFR 63.6603(a), 40 CFR 63.6625(h)]
- 296 [40 CFR 63.6603(a)] Change oil and filter every 500 hours of operation or annually, whichever comes first. Subpart ZZZZ. [40 CFR 63.6603(a)]

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AI ID: 1314 - Rhodia Inc

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EQT 0291 M10 - Diesel Fire-Water Pump

- 297 [40 CFR 63.6605(a)] Be in compliance with emission limitations and operating limitations in 40 CFR 63 Subpart ZZZZ at all times. Subpart ZZZZ. [40 CFR 63.6605(a)]
- 298 [40 CFR 63.6605(b)] Operate and maintain at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6605(b)]
- 299 [40 CFR 63.6625(e)] Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6625(e)]
- 300 [40 CFR 63.6625(f)] Install a non-resettable hour meter. Subpart ZZZZ. [40 CFR 63.6625(f)]
- 301 [40 CFR 63.6640(a)] Demonstrate continuous compliance with each applicable emission limitation and operating limitation in 40 CFR 63 Subpart ZZZZ Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d according to methods specified in 40 CFR 63 Subpart ZZZZ Table 6. Subpart ZZZZ. [40 CFR 63.6640(a)]
- 302 [40 CFR 63.6640(f)(1)ii] Operate for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Limit maintenance checks and readiness testing to 100 hours per year. Subpart ZZZZ. [40 CFR 63.6640(f)(1)ii]
- 303 [40 CFR 63.6640(f)(1)iii] Operate up to 50 hours per year in non-emergency situations, but count those 50 hours towards the 100 hours per year provided for maintenance and testing. Do not use the 50 hours per year for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that the emergency engine may be operated for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. Do not operate for more than 30 minutes prior to the time when the emergency condition is expected to occur, and terminate the engine operation immediately after the facility is notified that the emergency condition is no longer imminent. Count the 15 hours per year of demand response operation as part of the 50 hours of operation per year provided for non-emergency situations. Subpart ZZZZ. [40 CFR 63.6640(f)(1)iii]
- 304 [40 CFR 63.6655] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.6655(a) through (f), as applicable. Subpart ZZZZ.
- 305 [40 CFR 63.Subpart ZZZZ] The 40 CFR 63 Subpart ZZZZ requirements listed for this engine become effective on May 3, 2013.
- 306 [LAC 33:III.1101.B] Opacity \leq 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: None specified
- 307 [LAC 33:III.1311.C] Opacity \leq 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: Six-minute average

GRP 0002 CAP-SAU - SULFURIC ACID UNITS 1 & 2

Group Members: RLP 0013 RLP 0014

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100009

Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

GRP 0002 CAP-SAU - SULFURIC ACID UNITS 1 & 2

- 308 [LAC 33:III.509.R.6.a] Before beginning actual construction of the project, permittee shall document and maintain a record of the following information: 1) a description of the project; 2) the emissions units whose emissions of a regulated pollutant could be affected by the project; and 3) a description of the applicability test used to determine that the project is not a major modification for any regulated pollutant, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded from the projected actual emissions (the demand growth exclusion) and an explanation for why such amount was excluded, and any netting calculations, if applicable. .
- 309 [LAC 33:III.509.R.6.c] After the first unit is debottlenecked, the permittee shall monitor the Sulfuric Acid Mist emissions that are emitted by this emission source (Unit 1 + Unit 2) which could increase as a result of the project and calculate and maintain a record of the annual emissions, in TPY on a 12-month rolling average basis, for a period of 10 years following resumption of regular operations after the change. Sulfuric Acid Emissions shall be estimated using actual production and an emission factor derived from biennial stack testing or other method approved by LDEQ Engineering. .
- 310 [LAC 33:III.509.R.6.e] Permittee shall submit a report to LDEQ within 60 days after the end of the year if annual emissions, in TPY, from the project in question exceed the baseline actual emissions by a "significant" (as defined in LAC 33:III.509.B) amount, and if such emissions differ from the preconstruction projection. This report shall contain the following: 1) the name, address, and telephone number of the major stationary source; 2) the annual emissions; and 3) any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection). .

GRP 0021 CAP-Comb - CAP - Combustion (Unit 1, Unit 2, Rental Boiler)

Group Members: EQT 0186RLP 0013 RLP 0014

- 311 [LAC 33:III.509.R.6.a] Before beginning actual construction of the project, permittee shall document and maintain a record of the following information: 1) a description of the project; 2) the emissions units whose emissions of a regulated pollutant could be affected by the project; and 3) a description of the applicability test used to determine that the project is not a major modification for any regulated pollutant, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded from the projected actual emissions (the demand growth exclusion) and an explanation for why such amount was excluded, and any netting calculations, if applicable. .
- 312 [LAC 33:III.509.R.6.c] After the first unit is debottlenecked, the permittee shall monitor the NOx emissions that are emitted by this emission source (Unit 1 + Unit 2) which could increase as a result of the project and calculate and maintain a record of the annual emissions, in TPY on a 12-month rolling average basis, for a period of 10 years following resumption of regular operations after the change. Emissions shall be estimated using actual production and the emission factor(s) established in the air permit application, except for debottlenecked units which shall use data collected from NOx CEMs. .
- 313 [LAC 33:III.509.R.6.c] After the first unit is debottlenecked, the permittee shall monitor the PM10 emissions that are emitted by this emission source (Unit 1 + Unit 2) which could increase as a result of the project and calculate and maintain a record of the annual emissions, in TPY on a 12-month rolling average basis, for a period of 10 years following resumption of regular operations after the change. Emissions shall be estimated using actual production and an emission factor derived from biennial stack testing or other method approved by LDEQ Engineering. .

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AI ID: 1314 - Rhodia Inc

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GRP 0021 CAP-Comb - CAP - Combustion (Unit 1, Unit 2, Rental Boiler)

- 314 [LAC 33:III.509.R.6.e] Permittee shall submit a report to LDEQ within 60 days after the end of the year if annual emissions, in TPY, from the project in question exceed the baseline actual emissions by a "significant" (as defined in LAC 33:III.509.B) amount, and if such emissions differ from the preconstruction projection. This report shall contain the following: 1) the name, address, and telephone number of the major stationary source; 2) the annual emissions; and 3) any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).

UNF 0002 UNF02 - Facility Wide

- 315 [40 CFR 60.] All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.
- 316 [40 CFR 61.145(b)(1)] Provide DEQ with written notice of intention to demolish or renovate prior to performing activities to which 40 CFR 61 Subpart M applies. Delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery is acceptable. Subpart M. [40 CFR 61.145(b)(1)]
- 317 [40 CFR 61.148] Do not install or reinstall on a facility component any insulating materials that contain commercial asbestos if the materials are either molded and friable or wet-applied and friable after drying. Subpart M.
- 318 [40 CFR 61.355] Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.
- 319 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Rhodia maintains records for five years as required by Title V. Subpart FF.
- 320 [40 CFR 61.357(d)(2)] Submit report: Due annually, beginning on the date that equipment necessary to comply with 40 CFR 61 Subpart FF has been certified in accordance with 40 CFR 61.357(d)(1). Submit updates to the information listed in 40 CFR 61.357(a)(1) through (a)(3) or, if the information in 40 CFR 61.357(a)(1) through (3) is not changed in the following year, a statement to that effect. Subpart FF. [40 CFR 61.357(d)(2)]
- 321 [40 CFR 61.] All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart A.
- 322 [40 CFR 63.1(b)(3)] An owner or operator of a stationary source who is in the relevant source category and who determines that the source is not subject to a relevant standard or other requirement established under 40 CFR 63 Subpart A must keep a record as specified in 63.10(b)(3). [40 CFR 63.1(b)(3)]
- 323 [40 CFR 63.1095(a)(1)iii] Keep a record of each shipment of continuous butadiene waste streams. Subpart XX. [40 CFR 63.1095(a)(1)iii]
- 324 [40 CFR 63.1095(a)(1)] Route the continuous butadiene stream to a treatment process or wastewater treatment system used to treat benzene waste streams that complies with the standards specified in 40 CFR 61.348. Subpart XX. [40 CFR 63.1095(a)(1)]
- 325 [40 CFR 63.1095(a)(1)] Include list of continuous butadiene waste streams in annual benzene NESHAP report and note whether or not streams were controlled. 40 CFR 63.1095(a)(1)(iv) & (v). Subpart XX. [40 CFR 63.1095(a)(1)]
- 326 [40 CFR 63.1095(a)(1)] Comply with the requirements of 40 CFR 61 Subpart FF, with the changes in 40 CFR 63 Subpart XX Table 2 and 40 CFR 63.1095(a)(1)(i) through (a)(1)(v). Subpart XX. [40 CFR 63.1095(a)(1)]

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UNF 0002 UNF02 - Facility Wide

- 327 [40 CFR 63.1095(a)(3)] Comply with the requirements of 40 CFR 63.1095 at all times except during periods of startup, shutdown, and malfunction, if the startup, shutdown, or malfunction precludes the ability of the affected source to comply with the requirements of 40 CFR 63.1095 and the provisions for periods of startup, shutdown, and malfunction, as specified in 40 CFR 63.1111, are followed. Subpart XX. [40 CFR 63.1095(a)(3)]
- 328 [40 CFR 63.1096(b)] Submit to EPA a written certification that affected waste streams will be managed and treated per the applicable sections in 40 CFR 63 Subpart XX. Not required unless/until written notice is received from generator of subject stream(s). Waste streams regulated under Subpart XX are to be treated and managed per 40 CFR Part 61 Subpart FF, National Emission Standards for Benzene Waste Operations. Rhodia's Baton Rouge site is already in compliance with Subpart FF and will manage XX-regulated waste streams in the same manner as for FF-regulated waste streams. Specifically, the XX-regulated waste streams will be burned as fuel in Unit No. 1 or Unit No. 2. Subpart XX. [40 CFR 63.1096(b)]
- 329 [40 CFR 63.1256(a)(5)(ii)(A)] Submit to EPA a written certification that affected wastewaters and/or wastewater residuals will be managed and treated per the applicable sections in 40 CFR 63.1256 (b) - (i). Not required unless/until written notice is received from generator of subject stream(s). Affected wastewater streams and/or residuals will be direct burned (i.e., bypassing storage) in the Unit No. 1 or Unit No. 2 furnace. [40 CFR 63.1256(a)(5)(ii)(A)]
- 330 [40 CFR 63.1256(b)] Comply with 40 CFR 63.1256(b) for each wastewater tank that receives, manages, or treats affected wastewater or its residual. Only Tanks 30D290 and 30D300 will be used for Subpart GGG regulated streams. [40 CFR 63.1256(b)]
- 331 [40 CFR 63.1256(d)(1)(iii)] For containers (trucks/railcars), the cover and all openings will be maintained in a closed position at all times that affected material is in the container except when necessary to use the opening for removal, inspection, sampling, or pressure relief events related to safety considerations. [40 CFR 63.1256(d)(1)(iii)]
- 332 [40 CFR 63.1256(g)(13)ii] Discharge affected streams to a boiler burning hazardous waste for which a final permit has been issued under 40 CFR Part 270 and that complies with the requirements of 40 CFR Part 266 Subpart H. The regeneration furnaces are regulated under RCRA as industrial furnaces and are defined as boilers in 40 CFR 1251. Per 1256(g)(13), RCRA units are exempt from the design evaluation or performance test requirements and from the monitoring requirements in 1256(a)(2)(iii) as well as recordkeeping and reporting requirements associated with monitoring and performance tests. [40 CFR 63.1256(g)(13)ii]
- 333 [40 CFR 63.132(g)(2)] Submit to EPA a written certification, signed by responsible official, that Group 1 wastewaters and/or wastewater residuals will be managed and treated per the applicable sections in 40 CFR 63.133 - 63.147. Not required unless/until written notice is received from generator of subject stream(s). [40 CFR 63.132(g)(2)]
- 334 [40 CFR 63.132(g)] Rhodia will comply with the provisions for off-site treatment of Group 1 HON wastewater or wastewater residuals in accordance with 40 CFR 63.132(g) if/when applicable. Subpart G. [40 CFR 63.132(g)]
- 335 [40 CFR 63.147] Maintain records as required by 40 CFR 63.147. This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to Rhodia. Subpart G.
- 336 [40 CFR 63.152(b)] Submit a Notification of Compliance Status (NCS) report within 150 days of the compliance date. As the treatment facility, the compliance date is the date upon which notice is first received that a HON Group 1 wastewater or wastewater residual has been received onsite. [40 CFR 63.152(b)]
- 337 [40 CFR 63.152(c)] Submit Periodic Reports: Due semiannually no later than 60 calendar days after the end of each 6-month period, except as specified in 40 CFR 63.152(c)(5) and (c)(6). Submit the first report no later than 8 months after the date the Notification of Compliance Status is due. Include the information specified in 40 CFR 63.152(c)(2) through (c)(4). Subpart G. [40 CFR 63.152(c)]

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UNF 0002 UNF02 - Facility Wide

- 338 [40 CFR 63.152(f)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records as specified in 40 CFR 63.152(f)(1) through (f)(7). Subpart G. [40 CFR 63.152(f)]
- 339 [40 CFR 68.150] Submit Risk Management Plan (RMP): Due no later than June 21, 1999, or three years after the date on which a regulated substance is first listed under 68.130, or the date on which a regulated substance is first present above a threshold quantity in a process. Submit in a method and format to a central point as specified by EPA prior to June 21, 1999.
- 340 [40 CFR 68.155] Provide in the RMP an executive summary that includes a brief description of the elements listed in 68.155(a) through (g).
- 341 [40 CFR 68.160] Complete a single registration form and include in the RMP. Cover all regulated substances handled in covered processes. Include in the registration the information specified in 68.160(b)(1) through (13).
- 342 [40 CFR 68.165] Submit in the RMP information the release scenarios specified in 68.165(a)(2). Include the data listed in 68.165(b)(1) through (13).
- 343 [40 CFR 68.180] Provide in the RMP the emergency response information listed in 68.180(a) through (c).
- 344 [40 CFR 68.190(c)] Submit revised registration to EPA: Due within six months after a stationary source is no longer subject to 40 CFR 68. Indicate that the stationary source is no longer covered. [40 CFR 68.190(c)]
- 345 [40 CFR 68.190] Review and update the RMP as specified in 68.190(b) and submit it in a method and format to a central point specified by EPA prior to June 21, 1999.
- 346 [40 CFR 68.200] Maintain records supporting the implementation of 40 CFR 68 for five years unless otherwise provided.
- 347 [40 CFR 68.22] Use the endpoints specified in 68.22(a) through (g) for analyses of offsite consequences.
- 348 [40 CFR 68.25] Analyze the release scenarios in 68.25, as specified in 68.25(a) through (h).
- 349 [40 CFR 68.30] Estimate in the RMP the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
- 350 [40 CFR 68.33] List in the RMP environmental receptors within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
- 351 [40 CFR 68.36(b)] Submit revised RMP: Due within six months after changes in processes, quantities stored or handled, or any other aspect of the stationary source increase or decrease the distance to the endpoint by a factor of two or more. [40 CFR 68.36(b)]
- 352 [40 CFR 68.36] Review and update the offsite consequence analyses at least once every five years. Complete a revised analysis within six months if changes in processes, quantities stored or handled, or any other aspect of the stationary source might reasonably be expected to increase or decrease the distance to the endpoint by a factor of two or more.
- 353 [40 CFR 68.39] Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain the records specified in 68.39(a) through (e) on the offsite consequence analyses.
- 354 [40 CFR 68.42] Include in the five-year accident history all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage. Include the information specified in 68.42(b)(1) through (10) for each accidental release.
- 355 [LAC 33:III.1103] Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.1111 or intensify an existing traffic hazard condition are prohibited.
- 356 [LAC 33:III.1109.B] Outdoor burning of waste material or other combustible material is prohibited.

SPECIFIC REQUIREMENTS

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- 357 [LAC 33:III.1303.B] Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
- 358 [LAC 33:III.2113.A] Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
- 359 [LAC 33:III.219] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- 360 [LAC 33:III.2901.D] Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
- 361 [LAC 33:III.2901.F] If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.
- 362 [LAC 33:III.501.C.6] Maintain best practical housekeeping and maintenance practices at the highest possible standards to control emissions of highly reactive volatile organic compounds (HRVOC), which include 1,3-Butadiene, Butene, cis-2-Butene, trans-2-Butene, Ethylene, Propylene, Toluene, Xylene, m/p-Xylene, o-Xylene. (State Only).
- 363 [LAC 33:III.501.C.6] Maintain, to the extent practicable, a leak-free facility taking such steps as are necessary and reasonable to prevent leaks and to expeditiously repair leaks that occur. Update the written plan presently required by LAC 33:III.2113.A.4 within 30 days of receipt of this permit to incorporate these general duty obligations into the housekeeping procedures. The plan shall then be considered a means of emission control subject to the required use and maintenance provisions of LAC 33:III.905. Failure to develop, use, and diligently maintain the plan shall be a violation of this permit. (State Only).
- 364 [LAC 33:III.501.C.6] Total HAP \leq 8.92 tons/yr. Total HAP emissions are capped at 8.92 TPY.
Which Months: All Year Statistical Basis: Annual maximum
- 365 [LAC 33:III.5105.A.1] Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard.
- 366 [LAC 33:III.5105.A.2] Do not cause a violation of any ambient air standard listed in LAC 33:III.Table 51.2, unless operating in accordance with LAC 33:III.5109.
- 367 [LAC 33:III.5105.A.3] Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
- 368 [LAC 33:III.5105.A.4] Do not fail to keep records, notify, report or revise reports as required under LAC 33:III.Chapter 51.Subchapter A.
- 369 [LAC 33:III.5107.A.2] Include a certification statement with the annual emission report and revisions to any emission report that attests that the information contained in the emission report is true, accurate, and complete, and that is signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official.
- 370 [LAC 33:III.5107.A] Submit Annual Emissions Report: Due annually, by the 31st of March unless otherwise directed by DEQ, to the Office of Environmental Assessment in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.

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- 371 [LAC 33:III.5107.B.1] Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but in no case later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere that results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).
- 372 [LAC 33:III.5107.B.2] Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:I.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:I.3923.
- 373 [LAC 33:III.5107.B.3] Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:I.3931. Submit notification in the manner provided in LAC 33:I.3923.
- 374 [LAC 33:III.5107.B.4] Submit written report: Due by certified mail to SPOC within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through B.3. Include the information specified in LAC 33:III.5107.B.4.a.i through B.4.a.viii.
- 375 [LAC 33:III.5107.B.5] Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, IF THEY CAN BE MEASURED AND CAN BE RELIABLY QUANTIFIED USING GOOD ENGINEERING PRACTICES, to DEQ along with the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
- 376 [LAC 33:III.5109.C] Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III.Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by DEQ.
- 377 [LAC 33:III.5113.A.1] Submit notification in writing: Due to SPOC not more than 60 days nor less than 30 days prior to initial start-up. Submit the anticipated date of the initial start-up.
- 378 [LAC 33:III.5113.A.2] Submit notification in writing: Due to SPOC within 10 working days after the actual date of initial start-up of the source. Submit the actual date of initial start-up of the source.
- 379 [LAC 33:III.5113.B.1] Ensure that all testing done to determine the emission of toxic air pollutants is conducted by qualified personnel.
- 380 [LAC 33:III.5113.B.1] Submit test results: Due in writing to the Office of Environmental Assessment within 60 days after completion of the test. Submit test results signed by the person responsible for the test.
- 381 [LAC 33:III.5113.B.1] Submit notification of testing: Due to the Office of Environmental Assessment at least 30 days prior to testing.
- 382 [LAC 33:III.5113.B.2] Conduct emission tests as set forth in accordance with Test Methods of 40 CFR, parts 60, 61, and 63 or in accordance with alternative test methods approved by DEQ.

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- 383 [LAC 33:III.5113.B.3] Provide necessary sampling and testing facilities, exclusive of instruments and sensing devices, as needed to properly determine the emission of toxic air pollutants.
- 384 [LAC 33:III.5113.B.4] Provide emission testing facilities as specified in LAC 33:III.5113.B.4.a through B.4.e.
- 385 [LAC 33:III.5113.B.5] Submit certified letter: Due to the Office of Environmental Assessment before the close of business on the sixtieth day following the completion of the emission test. Report the determinations of the emission test.
- 386 [LAC 33:III.5113.B.5] Analyze samples and determine emissions within 30 days after each emission test has been completed.
- 387 [LAC 33:III.5113.B.6] Retain records of emission test results and other data needed to determine emissions. Retained records at the source, or at an alternate location approved by DEQ for a minimum of two years, and make available upon request for inspection by DEQ.
- 388 [LAC 33:III.5113.B.7] Submit notification: Due to the Office of Environmental Assessment at least 30 days before the emission test. Submit notification of emission test to allow DEQ the opportunity to have an observer present during the test.
- 389 [LAC 33:III.5113.C.1] Maintain and operate each monitoring system in a manner consistent with good air pollution control practices for minimizing emissions. Repair or adjust any breakdown or malfunction of the monitoring system as soon as practicable after its occurrence.
- 390 [LAC 33:III.5113.C.5.d] Install all continuous monitoring systems or monitoring devices to make representative measurements under variable process or operating parameters.
- 391 [LAC 33:III.5113.C.5.e] Collect and reduce all data as specified in LAC 33:III.5113.C.5.e.i and ii.
- 392 [LAC 33:III.5113.C.7] Maintain records of monitoring data, monitoring system calibration checks, and the occurrence and duration of any period during which the monitoring system is malfunctioning or inoperative. Maintain these records at the source, or at an alternative location approved by DEQ, for a minimum of three years and make available, upon request, for inspection by DEQ.
- 393 [LAC 33:III.5151.F.1.f] An individual or company contracted to perform a demolition or renovation activity which disturbs RACM must be recognized by the Licensing Board for Contractors to perform asbestos abatement, and shall meet the requirements of LAC 33:III.5151.F.2 and F.3 for each demolition or renovation activity.
- 394 [LAC 33:III.535] Permittee shall comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and the Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC 33:III.537]. [LAC 33:III.535, LAC 33:III.537]
- 395 [LAC 33:III.5611.A] Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by the administrative authority.
- 396 [LAC 33:III.5611.B] During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.
- 397 [LAC 33:III.5901.A] Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.
- 398 [LAC 33:III.5907] Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur.
- 399 [LAC 33:III.5911.A] Submit registration: Due January 31, 1998, or within 60 days after the source becomes subject to LAC 33:III.Chapter 59, whichever is later. Include the information listed in LAC 33:III.5911.B, and submit to the Office of Environmental Compliance.
- 400 [LAC 33:III.5911.C] Submit amended registration: Due to the Office of Environmental Compliance within 60 days after the information in the submitted registration is no longer accurate.

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401 [LAC 33:III.919.D]

Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D.

402 [LAC 33:III.927]

Report the unauthorized discharge of any air pollutant into the atmosphere in accordance with LAC 33:I.Chapter 39, Notification Regulations and Procedures for Unauthorized Discharges. Submit written reports to the department pursuant to LAC 33:I.3925. Submit timely and appropriate follow-up reports detailing methods and procedures to be used to prevent similar atmospheric releases.

TABLE 1: APPLICABLE LOUISIANA AN

Source ID No:	TEMPO ID	Descriptive Name of Source	NSPS 40 CFR 60							NESHAP S 40 CFR			NESHAP PS 40 CFR	
			A	Ka	Kb+	VV	III	NNN	RRR	YYY	A	M	FF	A
	GRP0011	Facility Wide	2				2	2	2	2	2	2	2	
101	EQT0009	Lights Tank Farm Scrubber C-165												
D-148	EQT010	Vanillin Solvent 1 Tank (MIBK Storage)												
D-149	EQT011	Ethyl Vanillin Solvent 1 Tank (MIBK Storage)												
D-152	EQT012	Solvent 2 Tank (MIBK Storage)												
D-153	EQT013	Solvent 2 Tank (MIBK Storage)												
D-169	EQT014	Solvent 3 Tank (Methanol Storage)												
102	EQT0015	Heavies Tank Farm Scrubber C-187												
D-107	EQT016	Guaiacol Storage Tank			2									
D-111	EQT017	Guetol Storage Tank			2									
D-113	EQT018	Glyoxylic Acid Storage Tank			2									
103	EQT0019	Condensation Scrubber C-201												
C-202	EQT188	Premixing Reactor												
C-207	EQT189	Veratrole Stripper												
C-216	EQT020	Guaiacol Recycle Tank												
C-217	EQT190	No. 1 Condensation Reactor												
C-219	EQT191	No. 2 Condensation Reactor												
C-221	EQT192	No. 3 Condensation Reactor												
C-223	EQT193	No. 4 Condensation Reactor												
C-225	EQT194	No. 5 Condensation Reactor												
C-227	EQT195	Polishing Reactor												
104	EQT0021	Solvent 1 Vent Scrubber C-248												
C-236	EQT022	Neutralization Surge Tank												
C-240	EQT023	Extractor Tails Upset Tank												
C-241	EQT196	Guaiacol Extraction Column												
C-243	EQT024	Extractor 1 Tails Safety Decanter												
C-244	EQT025	Mandelate Surge Tank												
C-245	EQT197	Solvent 1 Washing Column												
C-247	EQT027	Solvent 1 Washing Safety Decanter												
C-249	EQT026	Solvent 1 Surge Tank												
C-301	EQT198	Guaiacol Recovery Column												
C-306	EQT199	Guaiacol / Tars Separator												
C-312	EQT200	Solvent 1 Stripper Decanter												
C-314	EQT201	Solvent 1 Stripper												
C-316	EQT202	Solvent 1 Cold Trap												
C-320	EQT203	Guaiacol Distillation Reflux Drum												
C-322X	EQT204	Solvent 1 Vacuum Package Separator												
H-317	EQT205	Vacuum System												
106	EQT0031	Vanillin Extraction Scrubber C-427												
C-421	EQT032	Solvent 2 Surge Tank												
C-429	EQT208	CO2 Separator												
C-430	EQT033	Solvent 2 Decanter												
C-432	EQT034	Extraction 2 Drain Tank												
C-434	EQT035	Extraction 2 Tails Safety Decanter												
C-435	EQT209	Vanillin Extraction Column												
C-440	EQT210	Solvent 2 Washing Column												
C-441	EQT036	Aqueous Phase Surge Tank												

FEDERAL AIR QUALITY REQUIREMENTS

Providence



PROVIDENCE

A/AI/PE 11000048100
KUL6

February 15, 2010

Ms. Cheryl Sonnier Nolan
Assistant Secretary
Office of Environmental Services
Louisiana Department of Environmental Quality
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

2010 FEB 15 PM 4:43

RE: Application for Renewal of a Title V Permit
Rhodia, Inc.
Agency Interest No. 1314
Permit No. 2184-V1

Dear Ms. Nolan:

On behalf of Rhodia, Inc., Providence is submitting this Title V air permit renewal application for the Cathyval Plant, Permit No. 2184-V1. Rhodia is submitting this permit renewal application in accordance with LAC 33:III.507.E.

Please call Ms. Julie Sheffield (359-3432) or Mr. John Richardson (359-3768) if you have any questions.

Sincerely,
Providence

Lynne Lamia Wallace
Project Engineer

Enclosure
cc Julie Sheffield, Rhodia

Shannon Snyder
EPA Region 6
1445 Ross Ave.
Dallas, TX 75202-2733

RECEIVED - 6PDL
AIR PLANNING SEC.
10 FEB 17 PM 3:32



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FEBRUARY 2010

RHODIA, INC.

CATHYVAL PLANT

**TITLE V PERMIT
RENEWAL
APPLICATION**

**AGENCY INTEREST
NO. 1314**

Prepared By:

Providence

1201 Main Street

Baton Rouge, Louisiana 70802

(225) 766-7400

www.providenceeng.com

Project Number 015-007



PROVIDENCE



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FIGURES

Figure

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APPENDICES

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SECTION 1.0
INTRODUCTION

1911



1.0 INTRODUCTION

1.1 Background

Rhodia, Inc. (Rhodia) owns and operates the Cathyval Plant in Baton Rouge, East Baton Rouge Parish, Louisiana. The Cathyval plant is collocated with the Rhodia Sulfuric Acid plant. Rhodia is bounded by U.S. 190 (Airline Highway) on the south, the Canadian Northern Railroad on the east, industrial area on the north, and the Mississippi River on the west. Figure 1 shows the site location.

The Cathyval Plant produces fine organic specialty chemicals that are used in food, fragrances, pharmaceuticals, and as laboratory reagents.

1.2 Project Description

The Cathyval Plant currently operates under Title V (Part 70) Operating Permit Number 2184-V1, issued September 4, 2007. This permit expires on August 16, 2010. In accordance with the requirements of LAC 33:Part III Chapter 5, Rhodia is submitting a renewal application at least six months prior to the expiration of the current Part 70 permit (i.e., February 16, 2010). Rhodia is therefore requesting renewal of its Part 70 permit for the Cathyval Plant.¹

Changes and permit reconciliations addressed in this renewal application include:

- Rhodia is requesting approval to remove **Scrubber C-419 (EPN 105, EQT0028)** from service. C-419 was designed in the late 1980s to provide 95% control of all VOCs, regardless of the mass emission rate of the VOC vents. The vessels that vent to C-419 have negligible VOC emissions and, as such, require a very high scrubber flow rate (42 gpm) to achieve 95% control compared to other scrubbers in the CathyVal plant (0.22 to 7.0 gpm). Stack testing is scheduled the week of February 22, 2010 to confirm Rhodia's belief that the minimal VOC control achieved does not warrant the energy and water resources currently being consumed to operate C-419. In anticipation of a successful test, this application includes a "delete" EIQ form for C-419 and an "add" EIQ form (**EPN 111**) for the uncontrolled "Oxidation Vent". Related to the proposed removal of C-419, the analyzer vents currently routed there are being added to the list of Insignificant Activities.

¹ The Rhodia Sulfuric Acid Plant is authorized under a separate permit and is not covered under this permit renewal application.



- A more accurate emission calculation for the cooling towers (**EPN M-5, EQT 0125**) has replaced the previous calculation. See the letter dated October 13, 2009 from Rhodia to LDEQ (Ms. Celena Cage) for background on this issue.
- Tote loading of o-vanillin, currently allowed per a *Notice and Go* form submitted October 24, 2007, is being incorporated into the permit as an Insignificant Activity.
- Predephenoling Vent Condenser E-318 and Detarring Condenser E-506 are being added to the equipment list; they were inadvertently excluded in the last permit modification.

To streamline reporting requirements, Rhodia requests the following changes to the current Specific Requirements (SR):

- Delete the scrubber reports required by SRs 5, 26, 42, 51, 73, 91, 122, 142, 161, 165, 182, 242, 262, 285, and 300, since this information is provided in the semiannual Title V monitoring reports.

To conserve water and energy resources and to improve consistency with emission calculations regarding operation of scrubbers and condensers during plant down time, Rhodia requests the following SR changes and additions:

- Add the following SR to EQTs 019, 021, 031, 040, 045, 051, and 056, "Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed."
- Revise SRs 27, 166, 244, and 301 to state "Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all organic contents and washed or (2) have minimal (e.g., breathing loss) emissions which have been included in the permit emissions limits."
- Revise SRs 6 and 265 to state "Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all organic contents and washed or (2) emit only breathing losses which have been included in the permit emissions limits (limited to 10 days per year)."
- Add the following SR to EQTs 076, 082, and 094, "Up to 16 hours per year, if/when scrubber becomes plugged during normal operation, scrubber water temperature will be increased to remove pluggage and restore proper operation." Note, this is not a new SR per se; it is being split off from the current SRs 244, 265, and 301.



- Move SR 263 from Scrubber C-319 (EQT 082) to Condenser E-318 (EQT TBD) and revise to state "Condenser must operate at all times unless the unit is not in operation and the vessels normally vented to the condenser (1) have been emptied of all organic contents and washed or (2) emit only breathing losses which have been included in the permit emissions limits (limited to 10 days per year if downstream scrubber is also off)."
- Revise SR 277, if possible, or add a new SR to EQT 087 to note that the 98% control standard per LAC 33:III.2115 does not apply when the unit is shut down and D-315 emits breathing losses only (less than 100 lbs in 24 hours).
- Move SR 286 from Scrubber C-402 (EQT 089) to Condenser E-401 (EQT 251) and revise to state "Condenser must operate at all times unless the unit is not in operation and the vessels normally vented to the condenser (1) have been emptied of all organic contents and washed or (2) have their vent line valved closed such that no emissions occur."
- Revise SR 288 to state "Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all organic contents and washed or (2) have their vent line valved closed such that no emissions occur."

1.3 Process Description

The Cathyval Plant consists of the Cathy, Daphne, and Vanessa production units, and a Wastewater Treatment Unit. Steam to operate these units is supplied by the waste heat boilers in the Sulfuric Acid Plant.

1.1.1 Cathy Unit

The Cathy Unit produces pyrocatechol (PC) and hydroquinone (HQ) for use as a raw material at the Daphne Unit and HQ for outside sales. PC and HQ are synthesized using a proprietary Rhodia hydroxylation process. Phenol and hydrogen peroxide react to form PC and HQ. The reaction mixture is dissolved in a light organic solvent in the extraction section. Unreacted phenol is removed using distillation and recycled back to the process. Waste acids and salts from the reaction are extracted in an aqueous phase and sent to waste water treatment. Recovered phenol is recycled and the tars are sent to the acid plant to be burned as fuel. Products (HQ and PC) are then separated in the splitter. Finally, PC is transferred to storage in molten form or flaked and packaged, and HQ is crystallized, centrifuged, dried, and packaged. PC may



also be mixed with a solvent and shipped as a liquid for certain customers.

1.1.2 Daphne Unit

The Daphne unit synthesizes guaiacol and guetol using a proprietary Rhodia process. Production of guaiacol and guetol from PC is similar except that the guetol process uses ethyl chloride as a reactant, whereas the guaiacol process uses methyl chloride. Veratrole and o-diethoxybenzene (ODEB) are produced as co-products for outside sales. Guaiacol is produced by a methylation process using PC, methyl chloride, and caustic in the presence of water and a light organic solvent. Guetol is produced by an ethylation process using PC, ethyl chloride, and caustic in the presence of water and a light organic solvent. The phases are separated, and organics in the aqueous layer are then removed by solvent extraction. The residual aqueous layer is sent to the waste treatment unit. The recovered mixture of organics and solvent is distilled to recover and recycle the solvent. It is then further distilled to recover pure guaiacol/guetol and veratrole/ODEB. The pure guaiacol/guetol is sent to the Vanessa Unit, or shipped to external customers by bulk shipments or in drums. Veratrole and ODEB are purified by washing and further distillation then shipped to external customers by bulk shipments or in drums. Heavy impurities from the distillations are sent to the acid plant to be burned as fuel.

The Daphne Unit operates in series with the Cathy and Vanessa Units, and runs more efficiently. Due to this higher efficiency, Rhodia may also utilize the Daphne Unit to manufacture para-methoxy-phenol (PMP) in place of guaiacol/guetol and veratrole/ODEB.

PMP and its byproduct para-di-methoxy-benzene (PDMB) are manufactured by methylation of HQ using methyl chloride. HQ produced by the Cathy Unit, or received from external suppliers, is used as a feedstock. The separation steps are similar to the guaiacol/guetol process. No purification of PDMB is necessary. PMP is shipped in bulk as a molten liquid.

1.1.3 Vanessa Unit

The Vanessa Unit synthesizes vanillin and ethyl vanillin utilizing a proprietary Rhodia process. In vanillin production, guaiacol reacts with sodium hydroxide to form sodium guaiacolate. Sodium guaiacolate is then condensed with glyoxylic acid to form sodium mandelate in the condensation section. In the extraction/distillation



section, the unreacted guaiacol is then extracted with solvent. The organic phase is distilled and the aqueous phase is stripped to recover the guaiacol and solvent for recycle. In the oxidation area, the aqueous mandelate solution is reacted with air and caustic in the presence of a catalyst to form vanillate. The aqueous vanillate solution is neutralized to form the product vanillin. The vanillin is then extracted with solvent. After recovery and recycling of the solvent, the vanillin is purified by washing and distillation and converted to the solid product by flaking or crystallizing and drying. Crystallized product is packaged into boxes or other containers. Flaked product is packaged in super-sacks. Ethyl vanillin is manufactured through the same series of steps by substituting guetol for guaiacol.

1.1.4 Wastewater Treatment Unit

All liquid effluents from the Cathyval Plant are routed to the Wastewater Treatment Unit via Tank 28 and/or Tank 29. The effluent is sent to the aeration basins where it is treated aerobically with an activated sludge process. The sludge is then separated from the liquid effluent in the clarifiers and solid-liquid separation equipment. The clarified effluent is then discharged to the Mississippi River. All stormwater from the Cathyval Plant is discharged to the Mississippi River after it has been flushed into Tank 29 to prevent potential contamination (oil, zinc, etc.) from reaching the river. The stored stormwater from Tank 29 is used as dilution water and treated as normal effluent into the aerobic/activated sludge process.

1.4 Air Emissions

The primary emissions from the Cathyval Plant process are volatile organic compounds (VOCs), some of which are HAP/TAPs, and particulate matter (PM₁₀). There is a small amount of natural gas combustion emissions as well. The Cathyval plant is not a major Title V source on its own, but is subject to Title V permitting due to its co-location with the Sulfuric Acid Plant.

Any vent streams containing the chlorinated hydrocarbons methyl chloride and ethyl chloride are vented conveyed to the sulfuric acid regeneration furnaces in the acid plant (primarily Sulfuric Acid Unit No. 1, EPN 3, with Unit No.2, EPN 2, as backup) for combustion and HCl control. Non-chlorinated vent streams containing light organics are controlled by condensers and scrubbers. The effluent from the scrubbers is either recycled within the process or sent to the wastewater treatment unit. Some of the water sent to the wastewater treatment unit is first sent to a



stripper, where organics are recovered and recycled to the process. The scrubbers are equipped with a continuous water flow meter as well as a high pressure drop alarm to ensure proper performance.

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SECTION 2.0

REGULATORY REVIEW



2.0 REGULATORY REVIEW

The Cathyval Plant is subject to federal and state air quality regulations. A regulatory review has been included that describes and cites all applicable Louisiana and federal air quality requirements and standards for the affected sources in the Cathyval Plant. The regulatory review consists of the regulatory applicability tables found in Section 4.

2.1 Louisiana Air Quality Regulations (LAC 33:III)

The Cathyval Plant is subject to the Permit Procedures (LAC 33:III Chapter 5), General Regulations on Control of Emissions (LAC 33:III Chapter 9), Emission Standards for Particulate Matter (LAC 33:III Chapter 13), Control of Emissions of Organic Compounds (LAC 33:III Chapter 21), Comprehensive Toxic Air Pollutant Emission Control Program (LAC 33:III Chapter 51), Prevention of Air Pollution Emergency Episodes (LAC 33:III Chapter 56), and Chemical Accident Prevention and Minimization of Consequences (LAC 33:III Chapter 59).

2.2 New Source Performance Standards (40 CFR 60)

There are no sources in the Cathyval Plant subject to New Source Performance Standards.

2.3 NESHAP Standards (40 CFR Part 61)

There are no sources in the Cathyval Plant subject to NESHAP.

2.4 MACT Standards (40 CFR Part 63)

There are no sources in the Cathyval Plant subject to MACT Standards. The site is not a major source of HAPs.

2.5 Non-Attainment New Source Review (40 CFR 51)

The Cathyval Plant is located in an area designated as nonattainment for ozone; however, there are no emission increases in this application that would trigger ozone nonattainment review.

2.6 Prevention of Significant Deterioration (40 CFR 51)

PSD applies to all criteria pollutants in an area that has been designated as attainment; i.e. all pollutants except ozone. There are no emission increases in this application that would trigger PSD review. Therefore, PSD does not apply.



2.7 Compliance Assurance Monitoring (40 CFR 64)

The Cathyval Plant has no sources subject to the CAM provisions at the facility.

2.8 Chemical Accident Prevention (40 CFR 68)

The chemical accidental release prevention program is mandated by Section.112(r) of the Clean Air Act Amendments of 1990 and is codified as 40 CFR Part 68. The Cathyval Plant is subject to this requirement and has prepared a Risk Management Plan.

2.9 Stratospheric Ozone Protection (40 CFR 82)

Title VI of the Clean Air Act Amendments of 1990 requires phase out of the manufacture and use of ozone-depleting chemicals. The Cathyval Plant does not manufacture ozone-depleting substances as regulated by 40 CFR Part 82. This facility uses certified plant personnel as well as outside certified contractors to conduct on-site maintenance of equipment, which may contain ozone-depleting materials. Therefore, the Cathyval Plant is subject to Parts B and F of the Stratospheric Ozone regulations.



SECTION 3.0

**APPLICATION FOR APPROVAL OF EMISSIONS
OF AIR POLLUTANTS**

100-100000



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100-100000

100-100000

Department of Environmental Quality
Office of Environmental Services
Air Permits Division
P.O. Box 4313
Baton Rouge, LA 70821-4313
(225) 219-3181

LOUISIANA

Application for Approval of Emissions of Air Pollutants from Part 70 Sources



PLEASE TYPE OR PRINT

1. Facility Information [LAC 33:III.517.D.1]

Facility Name (if any) Rhodia Baton Rouge CATHYVAL Plant	
Agency Interest Number (A.I. Number) 1314	Currently Effective Permit Number(s) 2184-V1
Company - Name of Owner Rhodia, Inc.	
Company - Name of Operator (if different from Owner)	
Parent Company (if Company - Name of Owner given above is a division)	

Ownership:

Check the appropriate box.

- | | | |
|---|--|--|
| <input checked="" type="radio"/> corporation, partnership, or sole proprietorship | <input type="radio"/> regulated utility | <input type="radio"/> municipal government |
| <input type="radio"/> state government | <input type="radio"/> federal government | <input type="radio"/> other, specify |

2. Physical Location and Process Description [LAC 33:III.517.D.18, unless otherwise stated]

What does this facility produce? Add more rows as necessary

This plant produces fine organic specialty chemicals that are used in food, fragrances, pharmaceuticals, and as laboratory reagents.

What modifications/changes are proposed in this application? Add more rows as necessary.

This application is for renewal of a Title V permit.

Nearest town (in the same parish as the facility):

Parish(es) where facility is located:

Baton Rouge				East Baton Rouge				
Distance To (mi):	222	Texas	269	Arkansas	129	Mississippi	262	Alabama
Latitude Front Gate:	30	Deg	30	Min	30	Sec	30	Hundredths
Longitude Front Gate:	91	Deg	11	Min	16	Sec	58	Hundredths
Distance from nearest Class I Area	143	Kilometers						

Add physical address and description of location of the facility below. If the facility has no address, provide driving directions. Add more rows as necessary.

1275 Airline Highway, Baton Rouge. At the foot of the old Mississippi River Bridge.

- ☒ Map attached (required per LAC 33:III.517.D.1)
- ☒ Description of processes and products attached (required per LAC 33:III.517.D.2)
- ☒ Introduction/Description of the proposed project attached (required per LAC 33:III.517.D.5)

1. The first part of the report discusses the general situation of the country and the progress of the work in the various departments. It also mentions the results of the recent elections and the state of the economy.

2. The second part of the report deals with the internal affairs of the country, including the administration, the judiciary, and the education system. It also mentions the state of the military and the police.

3. The third part of the report discusses the external affairs of the country, including the relations with the neighboring countries and the international community. It also mentions the state of the foreign trade and the diplomatic relations.

4. The fourth part of the report deals with the social and economic conditions of the country, including the state of the agriculture, the industry, and the commerce. It also mentions the state of the population and the social services.

5. The fifth part of the report discusses the progress of the work in the various departments, including the education, the health, and the social welfare. It also mentions the state of the public works and the infrastructure.

6. The sixth part of the report deals with the financial situation of the country, including the state of the budget, the revenue, and the expenditure. It also mentions the state of the public debt and the financial management.

7. The seventh part of the report discusses the progress of the work in the various departments, including the education, the health, and the social welfare. It also mentions the state of the public works and the infrastructure.

8. The eighth part of the report deals with the progress of the work in the various departments, including the education, the health, and the social welfare. It also mentions the state of the public works and the infrastructure.

9. The ninth part of the report discusses the progress of the work in the various departments, including the education, the health, and the social welfare. It also mentions the state of the public works and the infrastructure.

10. The tenth part of the report deals with the progress of the work in the various departments, including the education, the health, and the social welfare. It also mentions the state of the public works and the infrastructure.

11. The eleventh part of the report discusses the progress of the work in the various departments, including the education, the health, and the social welfare. It also mentions the state of the public works and the infrastructure.

12. The twelfth part of the report deals with the progress of the work in the various departments, including the education, the health, and the social welfare. It also mentions the state of the public works and the infrastructure.

13. The thirteenth part of the report discusses the progress of the work in the various departments, including the education, the health, and the social welfare. It also mentions the state of the public works and the infrastructure.

14. The fourteenth part of the report deals with the progress of the work in the various departments, including the education, the health, and the social welfare. It also mentions the state of the public works and the infrastructure.

15. The fifteenth part of the report discusses the progress of the work in the various departments, including the education, the health, and the social welfare. It also mentions the state of the public works and the infrastructure.

3. Confidentiality [LAC 33.I.Chapter 5]

Are you requesting confidentiality for any information except air pollutant emission rates ?

☐ Yes ☒ No

If "yes," list the sections for which confidentiality is requested below. Add rows as necessary. Confidentiality requests require a submittal that is separate from this application. Information for which confidentiality is requested should not be submitted with this application. Consult instructions.

4. Type of Application [LAC 33:III.517.D]

Complete the appropriate column (1 or 2) that corresponds to the type of permit being sought. Check all that apply within the appropriate column.

Column 1	Column 2
<input type="checkbox"/> Part 70 General	<input checked="" type="checkbox"/> Part 70 Regular
<input type="checkbox"/> Renewal	<input checked="" type="checkbox"/> Renewal
Select one, if applicable: <input type="checkbox"/> Entirely new facility <input type="checkbox"/> Modification or expansion of existing facility (may also include reconciliations) <input type="checkbox"/> Reconciliation only <input type="checkbox"/> Individual emissions unit(s) addition	Select one, if applicable: <input type="checkbox"/> Entirely new facility <input type="checkbox"/> Significant modification or expansion of existing facility (may also include reconciliations) [LAC 33:III.527] <input type="checkbox"/> Minor modification or expansion of existing facility (may also include reconciliations) [LAC 33:III.525] <input type="checkbox"/> Reconciliation only NSR Analysis: <input type="checkbox"/> PSD <input type="checkbox"/> NNSR
Does this submittal update or replace an application currently under review?	
<input type="radio"/> Yes <input checked="" type="radio"/> No	
If yes, provide date that the prior application was submitted:	
Select one if this application is for an existing facility that does not have an air quality permit: <input type="checkbox"/> Previously Grandfathered (LAC 33:III.501.B.6) <input type="checkbox"/> Previously Exempted (e.g., Small Source Exemption; Act 918) <input type="checkbox"/> Previously Unpermitted	

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5. Fee Information [LAC 33:III.517.D.17]

Fee Parameter: If the fee code is based on an operational parameter (such as number of employees or capital cost), enter that parameter here.

Industrial Category: Enter the Standard Industrial Classification (SIC) Codes that apply to the facility.

Primary SICC: 2869

Secondary SICC(s):

Project Fee Calculation: Enter fee code, permit type, production capacity/throughput, and fee amount pursuant to LAC 33:III.Chapter 2. Add rows to this table as needed. Include with the application the amount in the Grand Total blank as the permit application fee.

FEE CODE	TYPE	EXISTING CAPACITY	INCREMENTAL INCREASE	SURCHARGE				TOTAL AMOUNT
				MULTIPLIER	NSPS	PSD	TOXICS	
0630		88MMlb	NA		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ 1,866.00
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
GRAND TOTAL								\$ 1,866.00

****Optional** Fee Explanation:** Use the space provided to give an explanation of the fee determination displayed above.

--

Electronic Fund Transfer (EFT): If paying the permit application fee using an Electronic Fund Transfer (EFT), please include the EFT Transaction Number, the Date that the EFT was made, and the total dollar amount submitted in the EFT. If not paying the permit application fee using EFT, leave blank.

EFT Transaction Number	Date of Submittal	Total Dollar Amount

6. Key Dates

<i>Estimated date construction will commence:</i>	NA
<i>Estimated date operation will commence:</i>	NA

7. Pending Permit Applications – For Process Unit-Specific Permits Only [LAC 33:III.517.D.18]

List all other process units at this facility for which Part 70 permit applications have been submitted, but have not been acted upon by LDEQ as of the date of submittal of this application. If none, state "none" in the table. ****It is not necessary to update this table during the permit review process, unless requested by LDEQ.****

Process Unit Name	Permit Number	Date Submitted

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that proper record-keeping is essential for the transparency and accountability of the organization. This section also outlines the various methods used to collect and analyze data, ensuring that the information is reliable and up-to-date.

2. The second part of the document focuses on the implementation of the proposed changes. It details the steps involved in the rollout process, from initial planning to final execution. This section also addresses potential challenges and provides strategies to overcome them, ensuring a smooth transition to the new system.

3. The third part of the document discusses the long-term impact of the changes. It highlights the expected benefits, such as improved efficiency and cost savings, and provides a timeline for when these benefits are anticipated to be realized. This section also includes a summary of the key findings and recommendations for future work.

4. The fourth part of the document provides a detailed analysis of the financial aspects of the project. It includes a breakdown of the costs associated with the implementation and a comparison of the expected savings against the initial investment. This section also discusses the potential risks and how they can be mitigated.

5. The fifth part of the document discusses the legal and regulatory requirements that must be met. It outlines the specific rules and regulations that apply to the organization and provides guidance on how to ensure compliance. This section also includes a summary of the key legal considerations and recommendations for future work.

6. The sixth part of the document provides a detailed analysis of the operational aspects of the project. It includes a breakdown of the tasks involved in the implementation and a comparison of the expected outcomes against the initial goals. This section also discusses the potential risks and how they can be mitigated.

7. The seventh part of the document discusses the human resources aspects of the project. It outlines the roles and responsibilities of the various teams involved in the implementation and provides guidance on how to ensure that all team members are properly trained and equipped. This section also includes a summary of the key HR considerations and recommendations for future work.

8. The eighth part of the document provides a detailed analysis of the communication aspects of the project. It includes a breakdown of the communication channels and a comparison of the expected outcomes against the initial goals. This section also discusses the potential risks and how they can be mitigated.

9. The ninth part of the document discusses the overall impact of the project. It highlights the key findings and recommendations for future work, providing a clear and concise summary of the project's outcomes. This section also includes a final statement of support for the project and a commitment to ongoing monitoring and evaluation.

10. The tenth part of the document provides a detailed analysis of the project's overall performance. It includes a breakdown of the project's progress and a comparison of the expected outcomes against the initial goals. This section also discusses the potential risks and how they can be mitigated.



8. LAC 33:I.1701 Requirements – Answer all below for new sources and permit renewals

Does the company or owner have federal or state environmental permits identical to, or of a similar nature to, the permit for which you are applying in Louisiana or other states? (This requirement applies to all individuals, partnerships, corporations, or other entities who own a controlling interest of 50% or more in your company, or who participate in the environmental management of the facility for an entity applying for the permit or an ownership interest in the permit.)		<input type="radio"/> Yes <input checked="" type="radio"/> No
If yes, list States: _____		
Do you owe any outstanding fees or final penalties to the Department? If yes, explain below. Add rows if necessary.		<input type="radio"/> Yes <input checked="" type="radio"/> No
Is your company a corporation or limited liability company? If yes, attach a copy of your company's Certificate of Registration and/or Certificate of Good Standing from the Secretary of State. The appropriate certificate(s) should be attached to the end of this application as an appendix.		<input type="radio"/> Yes <input checked="" type="radio"/> No

9. Permit Shield Request [LAC 33:III.517.E.7]

If yes, check the appropriate boxes to indicate the type of permit shield being sought. Include the specific regulatory citation(s) for which the shield is being requested. Give an explanation of the circumstances that will justify the permit shield request. Attach additional pages if necessary. If additional pages are used, attach them directly behind this page and enter "See Attached Pages" into the Explanation field.	<input type="radio"/> Yes <input checked="" type="radio"/> No
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Type of Permit Shield request (check all that apply):

Non-applicability determination	Specific Citation(s)	Explanation
<input type="checkbox"/> 40 CFR 60		
<input type="checkbox"/> 41 CFR 61		
<input type="checkbox"/> 42 CFR 63		
<input type="checkbox"/> PSD		
<input type="checkbox"/> NNSR		
Interpretation of monitoring/recordkeeping/ reporting and/or means of compliance	Specific Citation(s)	Explanation
<input type="checkbox"/> 40 CFR 60		
<input type="checkbox"/> 41 CFR 61		
<input type="checkbox"/> 42 CFR 63		
<input type="checkbox"/> PSD		
<input type="checkbox"/> NNSR		
<input type="checkbox"/> State Implementation Plan (SIP)		

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes the need for transparency and accountability in financial reporting.

2. The second part of the document outlines the various methods and techniques used to collect and analyze data. It includes a detailed description of the experimental procedures and the statistical analysis performed.

3. The third part of the document presents the results of the study. It includes a series of tables and graphs that illustrate the findings of the research. The data shows a clear trend of increasing activity over time.

4. The fourth part of the document discusses the implications of the findings. It suggests that the results have significant implications for the field of study and may lead to further research in this area.

5. The fifth part of the document concludes the study. It summarizes the main findings and provides a final statement on the importance of the research.

10. Certification of Compliance with Applicable Requirements

Statement for Applicable Requirements for Which the Company and Facility Referenced In This Application Is In Compliance

Based on information and belief, formed after reasonable inquiry, the company and facility referenced in this application is in compliance with and will continue to comply with all applicable requirements pertaining to the sources covered by the permit application, as outlined in Tables 1 and 2 in the permit application.

For requirements promulgated as of the date of this certification with compliance dates effective during the permit term, I further certify that the company and facility referenced in this application will comply with such requirements on a timely basis and will continue to comply with such requirements.

CERTIFICATION: I certify, under provisions in Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information contained in this Application for Approval of Emissions of Air Pollutants from Part 70 Sources, including all attachments thereto and the compliance statement above, are true, accurate, and complete.			CERTIFICATION: I certify that the engineering calculations, drawings, and design are true and accurate to the best of my knowledge.		
a. Responsible Official			b. Professional Engineer		
Name Daniel Tate			Name Stephen Scott Gendron		
Title Plant Manager			Title Operations Superintendent		
Company Rhodia, Inc.			Company Rhodia, Inc.		
Suite, mail drop, or division			Suite, mail drop, or division		
Street or P.O. Box 1275 Airline Highway			Street or P.O. Box 1275 Airline Highway		
City Baton Rouge	State LA	Zip 70805	City Baton Rouge	State LA	Zip 70805
Business phone (225) 356-7111			Business phone (225) 359-3464		
Email Address <i>daniel.tate@us.rhodia.com</i>			Email Address <i>Stephen.gendron@us.rhodia.com</i>		
Signature of responsible official (See 40 CFR 70.2) <i>Daniel H Tate</i>			Signature of Professional Engineer <i>Stephen Scott Gendron</i>		
Date <i>2/11/10</i>			Date <i>2/11/10</i>		
			Louisiana Registration No. <i>27141</i>		



11. Personnel [LAC 33:III.517.D.1]**a. Manager of Facility who is located at plant site**

Name <input type="radio"/> Primary Contact		
Daniel Tate		
Title Plant Manager		
Company Rhodia, Inc.		
Suite, mail drop, or division		
Street or P.O. Box 1275 Airline Highway		
City Baton Rouge	State LA	Zip 70805
Business phone (225) 356-7111		
Email Address		

b. On-site contact regarding air pollution control

Name <input checked="" type="radio"/> Primary Contact		
John Richardson		
Title Environmental Manager		
Company Rhodia, Inc.		
Suite, mail drop, or division		
Street or P.O. Box 1275 Airline Highway		
City Baton Rouge	State LA	Zip 70805
Business phone (225) 359-3768		
Email Address		

c. Person to contact with written correspondence

Name <input type="radio"/> Primary Contact		
John Richardson		
Title Environmental Manager		
Company Rhodia, Inc.		
Suite, mail drop, or division		
Street or P.O. Box 1275 Airline Highway		
City Baton Rouge	State LA	Zip 70805
Business phone (225) 359-3768		
Email Address		

d. Person who prepared this report

Name <input type="radio"/> Primary Contact		
Lynne Lamia Wallace		
Title Project Engineer		
Company Providence		
Suite, mail drop, or division		
Street or P.O. Box 1201 Main Street		
City Baton Rouge	State LA	Zip 70802
Business phone (225) 766-7400		
Email Address lynnewallace@providenceeng.com		

e. Person to contact about Annual Maintenance Fees	See "b"		
Name	Street or P.O. Box		
Title	City	State	Zip
Company	Business phone		
Suite, mail drop, or division	Email Address		

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that proper record-keeping is essential for the transparency and accountability of the organization. This section also outlines the various methods used to collect and analyze data, ensuring that the information is reliable and up-to-date.

2. The second part of the document focuses on the implementation of the proposed changes. It details the steps involved in the transition process, from the initial planning phase to the final execution. This section highlights the challenges faced during the implementation and the strategies used to overcome them. It also provides a timeline for the completion of the project, ensuring that all stakeholders are aware of the progress and deadlines.

3. The third part of the document discusses the future outlook of the organization. It outlines the long-term goals and objectives, as well as the strategies to achieve them. This section also addresses the potential risks and challenges that may arise in the future and provides recommendations for how to mitigate them. It concludes by emphasizing the commitment of the organization to continuous improvement and innovation.



12. Proposed Project Emissions [LAC 33:III.517.D.3]

List the total emissions following the proposed project for this facility or process unit (for process unit-specific permits). Speciate all criteria pollutants, TAP, and HAP for the proposed project.

Pollutant	Proposed Emission Rate (tons/yr)
PM ₁₀	19.51
SO ₂	0.03
NOx	4.41
CO	3.71
VOC Total	26.46
Ethyl Chloride	0.12
Hydroquinone	0.37
Methanol	3.38
Methyl Chloride	0.23
Methyl Isobutyl Ketone	9.11
Phenol	0.51
Pyrocatechol	0.47

13. History of Permitted Emissions [LAC 33:III.517.D.18]

List each of the following in chronological order:

- The Permit Number and Date Action Issued for each air quality permit that has been issued to this facility or process unit (for process unit-specific permits) within the last ten (10) years.
- All small source exemptions, authorizations to construct, administrative amendments, case-by-case insignificant activities, and changes of tank service that have been approved since the currently effective Title V Operating Permit or State Operating Permit was issued to this facility or process unit (for process unit-specific permits). It is not necessary to list any such activities issued prior to the issuance of the currently effective Title V Operating Permit or State Operating Permit, if one exists.

Permit Number	Date Action Issued
2184-V0	August 15, 2005
2184-V1 (permit mod)	April 20, 2007
2184-V1 (amended permit)	September 4, 2007
Case by Case Insignificant Activity	October 24, 2007

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14. Facility-wide Permitted Emissions – For Process Unit-Specific Permits Only [LAC 33:III.517.D.3]

List each of the following:

- All currently effective air quality permits for this facility. All process units located at this facility should be represented in this section. This includes any Acid Rain or PSD permits.

For each listed currently effective air quality permit:

- Show each permitting action's grand total for each permitted pollutant. These rates should be those shown in the permitting action as issued by LDEQ and not those shown in the application for the permitting action. For administrative amendments, it is only necessary to state the emission rates that were amended.

- Group the permitted emission rates by permit action. Consult instructions.

As the last entry, show the facility-wide grand total for each pollutant.

Permit Actions	Date Action Issued	Pollutant	Permitted Emission Rate (tons/yr)
2184-V1 (amended permit)	September 4, 2007	PM ₁₀	7.74
		SO ₂	0.03
		NO _x	4.41
		CO	3.70
		VOC Total	25.02
		Pyrocatechol	0.72
		Hydroquinone	1.13
		Phenol	0.49
		Methyl Isobutyl Ketone	9.74
		Methanol	3.50
		Ethyl Chloride (chloroethane)	0.12
		Methyl Chloride (chloromethane)	0.24
0840-00033-V2	November 30, 2009	PM ₁₀	54.52
		SO ₂ (Phase I)	12449.35
		SO ₂ (Phase II)	4725.98
		SO ₂ (Phase III)	1077.79
		NO _x	115.58
		CO	95.43
		VOC Total	26.16
		Pyrocatechol	1.00
		Hydroquinone	1.00



14. Facility-wide Permitted Emissions – For Process Unit-Specific Permits Only [LAC 33:III.517.D.3]

List each of the following:

- All currently effective air quality permits for this facility. All process units located at this facility should be represented in this section. This includes any Acid Rain or PSD permits.

For each listed currently effective air quality permit:

- Show each permitting action's grand total for each permitted pollutant. These rates should be those shown in the permitting action as issued by LDEQ and not those shown in the application for the permitting action. For administrative amendments, it is only necessary to state the emission rates that were amended.

- Group the permitted emission rates by permit action. Consult instructions.

As the last entry, show the facility-wide grand total for each pollutant.

Permit Actions	Date Action Issued	Pollutant	Permitted Emission Rate (tons/yr)
		Phenol	0.18
		Methyl Isobutyl Ketone	0.02
		Methanol	1.00
		Ethyl Chloride (chloroethane)	0.12
		Methyl Chloride (chloromethane)	0.89
	<i>Note: The remaining 160+ TAPs from the Sulfuric Acid Plant are not emitted in Cathyal and are too numerous to list here.</i>		
Grand Total		PM ₁₀	62.26
		SO ₂ (Phase I)	12449.38
		SO ₂ (Phase II)	4726.01
		SO ₂ (Phase III)	1077.82
		NOx	119.99
		CO	99.13
		VOC Total	51.18
		Pyrocatechol	1.72
		Hydroquinone	2.13
		Phenol	0.67
		Methyl Isobutyl Ketone	9.76
		Methanol	4.50
		Ethyl Chloride	0.24
		Methyl Chloride	1.13

1. The first part of the report is a summary of the work done during the period.

2. The second part is a detailed description of the work done.

3. The third part is a summary of the results of the work.

4. The fourth part is a summary of the conclusions of the work.

5. The fifth part is a summary of the recommendations of the work.

6. The sixth part is a summary of the work done during the period.

7. The seventh part is a summary of the work done during the period.

8. The eighth part is a summary of the work done during the period.

9. The ninth part is a summary of the work done during the period.

10. The tenth part is a summary of the work done during the period.

11. The eleventh part is a summary of the work done during the period.

12. The twelfth part is a summary of the work done during the period.

13. The thirteenth part is a summary of the work done during the period.

14. The fourteenth part is a summary of the work done during the period.

15. The fifteenth part is a summary of the work done during the period.

16. The sixteenth part is a summary of the work done during the period.

17. The seventeenth part is a summary of the work done during the period.

18. The eighteenth part is a summary of the work done during the period.

19. The nineteenth part is a summary of the work done during the period.

20. The twentieth part is a summary of the work done during the period.

21. The twenty-first part is a summary of the work done during the period.

22. The twenty-second part is a summary of the work done during the period.

23. The twenty-third part is a summary of the work done during the period.

24. The twenty-fourth part is a summary of the work done during the period.

25. The twenty-fifth part is a summary of the work done during the period.

26. The twenty-sixth part is a summary of the work done during the period.

27. The twenty-seventh part is a summary of the work done during the period.

28. The twenty-eighth part is a summary of the work done during the period.

29. The twenty-ninth part is a summary of the work done during the period.

30. The thirtieth part is a summary of the work done during the period.

15.a. Enforcement Actions [LAC 33:III.517.D.18]

If yes, list all federal and state air quality enforcement actions, settlement agreements, and consent decrees received for this facility and/or process unit (for process unit-specific permits) since the issuance of the currently effective Title V Operating Permit or State Operating Permit. For each action, list the type of action (or its tracking number), the regulatory authority or authorities that issued the action, and the date that the action was issued. Summarize the conditions imposed by the enforcement action, settlement agreement, and consent decree in Section 23, Table 2. It is not necessary to submit a copy of the referenced action. Add rows to table as necessary.

☐ Yes ☒ No

None for the Cathyval Plant

Type of Action or Tracking Number	Issuing Authority	Date Action Issued	Summary of Conditions Included?
			<input type="radio"/> Yes <input checked="" type="radio"/> No

15.b. Schedule for Compliance [LAC 33:III.517.E.4]

If the facility or process unit for which application is being made is not in full compliance with all applicable regulations, give a description of how compliance will be achieved, including a schedule for compliance below. Add rows as necessary. See instructions.

☐ Yes ☒ No
16. Letters of Approval for Alternate Methods of Compliance

If yes, list all correspondence with LDEQ, EPA, or other regulatory bodies that provides for or supports a request for alternate methods of compliance with any applicable regulations for this facility or process unit (for process unit-specific permits). List the date of issuance of the letter and the regulation referenced by the letter. Attach as an appendix a copy of all documents referenced in this table. Letters that are not included may not be incorporated into a final permit. Add rows to table as necessary.

☒ Yes ☐ No

Date Letter Issued	Issuing Authority	Referenced Regulation(s)	Copy of Letter Attached?
April 24, 2006	LDEQ	LAC 33:III.2147.E.4.a	<input checked="" type="radio"/> Yes* <input type="radio"/> No

* Appendix A

17. Initial Notifications and Performance Tests [LAC 33:III.517.E.1]

If yes, list any initial notifications that have been submitted or one-time performance tests that have been performed for this facility or process unit (for process unit-specific permits) since the issuance of the currently effective Title V Operating Permit or State Operating Permit in order to satisfy regulatory requirements. Any initial notification or one-time performance test requirements that have not been satisfied should be listed in Section 23, Table 2 of this application. Any notifications or performance tests that recur periodically should also be properly noted in Section 23, Table 2 of this application. Add rows to table as necessary.

☐ Yes ☒ No

Initial Notification or One-time Performance Test?	Regulatory Citation Satisfied	Date Completed/Approved

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that proper record-keeping is essential for the integrity of the financial system and for the ability to detect and prevent fraud. The text also mentions the need for regular audits and the role of independent auditors in ensuring the reliability of the data.



2. The second part of the document outlines the procedures for the collection and distribution of funds. It details the steps involved in the process, from the initial request to the final disbursement. The text also discusses the importance of transparency and accountability in these processes, as well as the need for clear communication between all parties involved.

3. The third part of the document addresses the issue of budgeting and financial planning. It provides guidance on how to develop a realistic budget and how to monitor and control expenses. The text also discusses the importance of having a contingency plan in place to deal with unexpected events or changes in circumstances.



4. The fourth part of the document focuses on the management of human resources. It discusses the importance of having a skilled and motivated workforce and provides advice on how to attract, retain, and develop talent. The text also touches on issues related to labor relations and the role of unions.

5. The fifth part of the document deals with the legal and regulatory aspects of the organization's operations. It outlines the various laws and regulations that the organization must comply with and provides guidance on how to ensure compliance. The text also discusses the importance of having a strong legal framework in place to protect the organization's interests.



6. The final part of the document provides a summary of the key points discussed and offers some concluding thoughts. It emphasizes the importance of continuous improvement and the need for the organization to stay up-to-date with the latest developments in its field. The text also expresses confidence in the organization's ability to achieve its goals and maintain its position as a leader in the industry.

18. Existing Prevention of Significant Deterioration or Nonattainment New Source Review Limitations [LAC 33:III.517.D.18]

Do one or more emissions sources represented in this permit application currently operate under one or more NSR permits? If "yes," summarize the limitations from such permit(s) in the following table. Add rows to table as necessary. Be sure to note any annual emissions limitations from such permit(s) in Sections 13 and 14 of this application.						<input type="radio"/> Yes <input checked="" type="radio"/> No
Permit No.	Date Issued	EPN	Pollutant	BACT/LAER Limit ¹	Averaging Period	Description of Control Technology/Work Practice Standards

¹For example, lb/MM Btu, ppmvd @ 15% O₂, lb/ton, lb/hr

19. Air Quality Dispersion Modeling [LAC 33:III.517.D.15]

Was Air Quality Dispersion Modeling as required by LAC 33:III performed in support of this permit application? (Air Quality Dispersion Modeling is only required when applying for PSD permits and as requested by LDEQ.)	<input type="radio"/> Yes <input checked="" type="radio"/> No
Has Air Quality Dispersion Modeling completed in accordance with LAC 33:III ever been performed for this facility in support of a air permit application previously submitted for this facility or process unit (for process unit-specific permits) or as required by other regulations AND approved by LDEQ?	<input checked="" type="radio"/> Yes <input type="radio"/> No
If yes, enter the date the most recent Air Quality Dispersion Modeling results as required by LAC 33:III were submitted:	March 2005

If the answer to either question above is "yes," enter a summary of the most recent results in the following table. If the answer to both questions is "no," enter "none" in the table. Add rows to table as necessary.

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	TAP AAS or NAAQS
MIBK	8-hour	323 µg/mg	4880

Handwritten text, mostly illegible due to extreme fading. The text appears to be organized into several paragraphs, with some lines indented. There are three circular stamps or marks on the right margin, one in each of the first three text blocks.

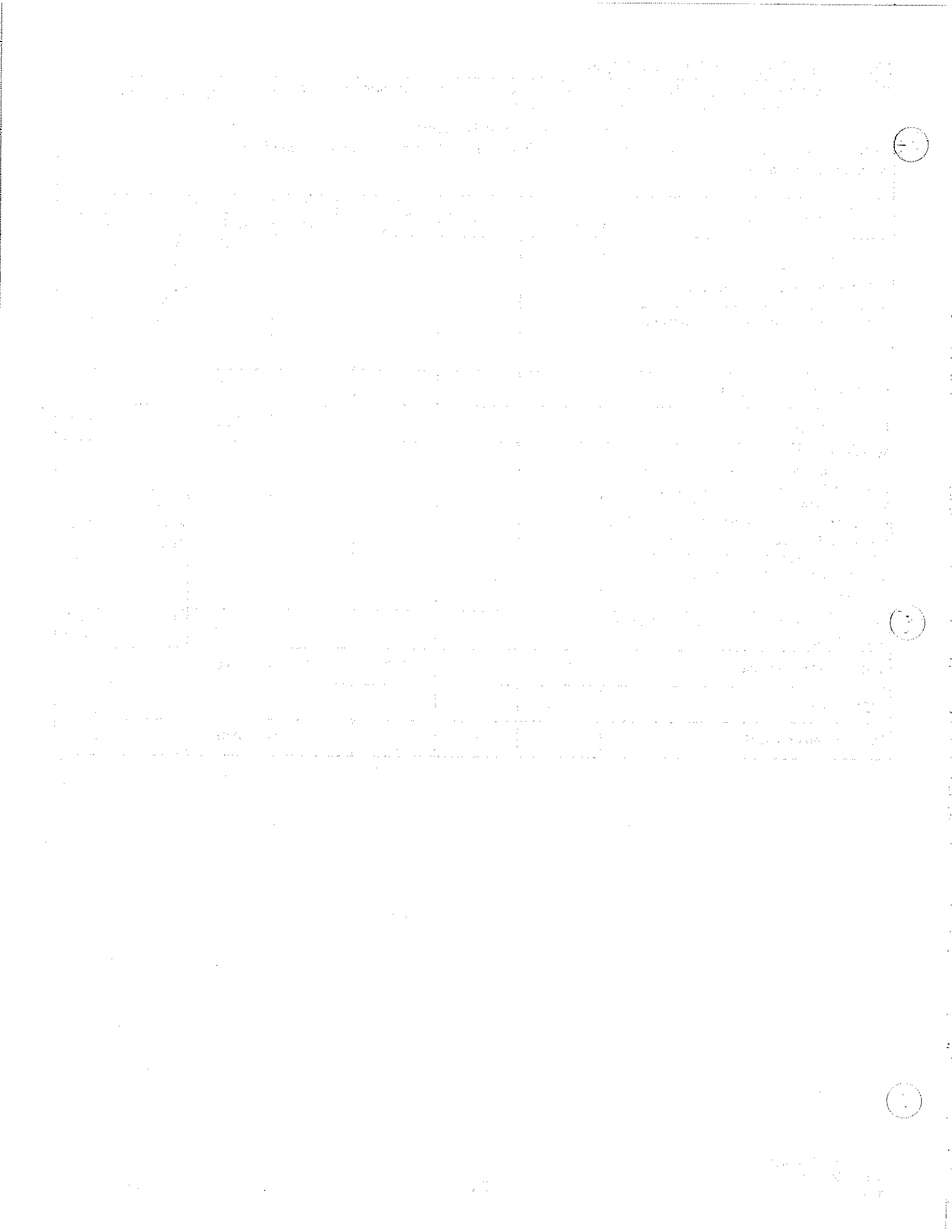
20. General Condition XVII Activities

Enter all activities that qualify as Louisiana Air Emissions Permit General Condition XVII Activities.

- Expand this table as necessary to include all such activities.
- See instructions to determine what qualifies as a General Condition XVII Activity.
- Do not include emissions from General Condition XVII Activities in the proposed emissions totals for the permit application.

☒ Yes ☐ No

Work Activity and Schedule	Emission Rates – TPY					
	PM ₁₀	SO ₂	NO _x	CO	VOC Total	Other
220 process samples/day for quality assurance. Collected in 4-oz bottles. Assume a max of 1% emitted to the atmosphere.					0.01	PC <0.01 HQ <0.01 phenol <0.01 MIBK <0.01 MeOH <0.01 EtCl <0.01 MeCl <0.01
Drum loading, unloading, and heating					0.22	
Phenol melting					0.02	phenol 0.02
Maintenance Activities, including: Opening/removing pumps, compressors, instruments, valves, vents, and piping; Vessel/equipment/tank truck/ISO container/rail car openings; Filter and strainer change-outs; Miscellaneous equipment cleaning; Nitrogen/steam/air clearing of equipment and lines; Waste handling/re-packaging					0.25	PC 0.03 HQ 0.03 phenol 0.03 MIBK 0.03 MeOH 0.03 EtCl 0.03 MeCl 0.03
Temporary storage of materials in tank trucks or ISO containers					0.05	PC 0.03 HQ <0.01
Diesel-Fired equipment	0.41	0.38	5.72	1.23	0.46	
Fugitive dust	0.05					
Tote Loading of o-Vanillin					0.07	



21. Insignificant Activities [LAC 33:III.501.B.5]

Enter all activities that qualify as Insignificant Activities.

- Expand this table as necessary to include all such activities.

- For sources claimed to be insignificant based on size or emission rate (LAC 33:III.501.B.5.A), information must be supplied to verify each claim. This may include but is not limited to operating hours, volumes, and heat input ratings.

- If aggregate emissions from all similar pieces of equipment (i.e. all LAC 33:III.501.B.5.A.1 activities) claimed to be insignificant are greater than 5 tons per year for any pollutant, then the activities can not be claimed as insignificant and must be represented as permitted emission sources. Consult instructions.

● Yes ○ No

EPN	Description	Physical/Operating Data	Citation
	Defoamer for Tars Process	55 gallon drums	LAC 33:III.501.B.5.A.2
	Defoamer for WWTU	55 gallon drums	LAC 33:III.501.B.5.A.2
	Polymer for WWTU - Vulcan 4864	250 gallon totes	LAC 33:III.501.B.5.A.2
D-309X	Clarifier Polymer Feed Tank	1050 gallons	LAC 33:III.501.B.5.A.3
D-407X	Filter Polymer Feed Tank	1690 gallons	LAC 33:III.501.B.5.A.3
D-317X	Polymer Makeup Tank	880 gallons	LAC 33:III.501.B.5.A.3
D-320	Clarifier Floating Layer Tank	750 gallons	LAC 33:III.501.B.5.A.3
D-323	Clarifier Underflow Tank	3170 gallons	LAC 33:III.501.B.5.A.3
D-316	Effluent Pump Tank	4300 gallons	LAC 33:III.501.B.5.A.3
D-420	Filtrate Tank	1260 gallons	LAC 33:III.501.B.5.A.3
C-104	Perchloric Acid Tank, P&ID F103	Vents to Y-132	LAC 33:III.501.B.5.A.4
D-101	H ₂ O ₂ Tank P&ID F102	Vents to Y-120V	LAC 33:III.501.B.5.A.4
D-102	H ₂ O ₂ Tank P&ID F102	Vents to Y-121V	LAC 33:III.501.B.5.A.4
D-106	Polyphosphoric Acid Tank, P&ID F103	Vents to Y-136	LAC 33:III.501.B.5.A.4
D-605	Metabisulfate Injection Tank, P&ID F601	Vents to atmosphere	LAC 33:III.501.B.5.A.4
D-664	Oxalic Acid Injection Drum	Vents to atmosphere	LAC 33:III.501.B.5.A.4
	4 Laboratory Vents	NA	LAC 33:III.501.B.5.A.6
	Analyzer Vents	NA	LAC 33:III.501.B.5.A.9
D-186	Vanessa Caustic Storage	100,900 gallons	LAC 33:III.501.B.5.B.40
D-305	Cathy Caustic Storage, P&ID F-302	1200 gallons	LAC 33:III.501.B.5.B.40
C-210	Daphne Caustic Storage	1200 gallons	LAC 33:III.501.B.5.B.40
C-243	Sulfuric Acid Dilution Tank	958 gallons	LAC 33:III.501.B.5.D



22. Regulatory Applicability for Commonly Applicable Regulations [LAC 33:III.517.D.10]

<i>Does this facility contain asbestos or asbestos containing materials?</i> If "yes," the facility or any portion thereof may be subject to 40 CFR 61, Subpart M, LAC 33:III.Chapter 27, and/or LAC 33:III.5151 and this application must address compliance as stated in Section 23 of this application.	<input type="radio"/> Yes <input checked="" type="radio"/> No
<i>Is the facility or process unit represented in this permit subject to 40 CFR 68, or is any other process unit located at the same facility as the process unit represented in this application subject to 40 CFR 68?</i> If "yes," the entire facility is subject to 40 CFR 68 and LAC 33:III.Chapter 59 and this application must address compliance as stated in Section 23 of this application.	<input checked="" type="radio"/> Yes <input type="radio"/> No
<i>Is the facility listed in LAC 33:III.5611</i>	
<i>Table 5</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<i>Table 6</i>	<input type="radio"/> Yes <input checked="" type="radio"/> No
<i>Table 7</i>	<input type="radio"/> Yes <input checked="" type="radio"/> No
<i>Does the applicant own or operate commercial refrigeration equipment normally containing more than 50 pounds of refrigerant at this facility or process unit?</i> If "yes," the entire facility is subject to 40 CFR 82, Subpart F and this application must address compliance as stated in Section 23 of this application.	<input checked="" type="radio"/> Yes <input type="radio"/> No



23. Applicable Regulations, Air Pollution Control Measures, Monitoring, and Recordkeeping

Important points for Table 1 [LAC 33:III.517.D.10]:

- List in Table 1, by Emission Point ID Number and Descriptive Name of the Equipment, state and federal pollution abatement programs and note the applicability or non-applicability of the regulations to each source.
- Adjust the headings for the columns in Table 1 as necessary to reflect all applicable regulations, in addition to any regulations that do not apply but need an applicability determination to verify this fact.
- For each piece of equipment, enter "1" for each regulation that applies. Enter "2" for each regulation that applies to this type of source, but from which this source of emissions is exempt. Enter "3" for equipment that is subject to a regulation, but does not have any applicable requirements. Also, enter "3" for each regulation that have applicable requirements that apply to the particular
- Leave the spaces blank when the regulations clearly would not apply under any circumstances to the source. For example, LAC 33:III.2103 – Storage of Volatile Organic Compounds would never apply to a steam generating boiler, no matter the circumstances.
- Consult instructions.

Important points for Table 2 [LAC 33:III.517.D.4; LAC 33:III.517.D.7; LAC 33:III.517.D.10]:

- For each piece of equipment listed in Table 2, include all applicable limitation, recordkeeping, reporting, monitoring, and testing requirements. Also include any one-time notification or one-time tests performance test requirements that have not been fulfilled.
- Each of these regulatory aspects (limitation, recordkeeping, reporting, etc.) should be addressed for each regulation that is applicable to each emissions source or emissions point.
- For each regulation that provides a choice regarding the method of compliance, indicate the method of compliance that will be employed. It is not sufficient to state that all compliance options will be employed, though multiple compliance options may be approved as alternative operating scenarios.
- Consult instructions.

Important points for Table 3 [LAC 33:III.517.D.16]:

- Each time a 2 or a 3 is used to describe applicability of a source in Table 1, an entry should be made in Table 3 that explains the exemption or non-applicability status of the regulation to that source.
- Fill in all requested information in the table.
- The exact regulatory citation that provides for the specific exemption or non-applicability determination should be entered into the Citation Providing for Exemption or Non-applicability column.
- Consult Instructions.

Important points for Table 4 [LAC 33:III.517.D.18]

- List any single emission source that routes its emissions to another point where these emissions are commingled with the emissions of other sources before being released to the atmosphere. Do not list any single emission source in this table that does not route its emissions in this manner.
- List any and all emission sources that are routed as described above. This includes emission sources that do not otherwise appear in this permit application.
- Consult instructions.

24. Emissions Inventory Questionnaire (EIQ) Forms [LAC 33:III.517.D.3; 517.D.6]

Complete one (1) EIQ for:

- Each emission source. If two emission sources have a common stack, the applicant may submit one EIQ sheet for the common emissions point. Note any emissions sources that route to this common point in Table 4 of the application.
- Each emissions CAP that is proposed. In general, this applies to each source that is part of the CAP.
- Each alternate operating scenario that a source may operate under. Some common scenarios are:
 1. Sources that combust multiple fuels
 2. Sources that have Startup/Shutdown max lb/hr emission rates higher than the max lb/hr for normal operating conditions would need an EIQ for the Startup/Shutdown emission rates for those sources
- Fugitive emissions releases. One (1) EIQ should be completed for each of the following types of fugitive emissions sources or emissions points:
 1. Equipment leaks.
 2. Non-equipment leaks (i.e. road dust, settling ponds, etc).

For each EIQ:

- Fill in all requested information.
- Speciate all Toxic Air Pollutants and Hazardous Air Pollutants emitted by the source.
- Use appropriate significant figures.
- Consult instructions.

The EIQ is in Microsoft Word Excel. Click on this link to get to the EIQ form.

http://www.deq.louisiana.gov/portal/LinkClick.aspx?link=permits%2fair%2f6-6-07_EIQ.xls&tabid=2758



25. NSR Applicability Summary [LAC 33:III.504 and LAC 33:III.509]☐ N/A

This section consists of five tables, A-E, and is applicable only to new and existing major stationary sources (as defined in LAC 33:III.504 or in LAC 33:III.509) proposing to permit a physical change or change in the method of operation. It would also apply to existing minor stationary sources proposing a physical change or change in the method of operation where the change would be a major source in and of itself. Add rows to each table as necessary. Provide a written explanation of the information summarized in these tables. Consult instructions.

25.A. Project Summary

EPN	Description	A	B	C	D	E	F
		New, Modified, Affected, or Unaffected*	Pre-Project Allowables (TPY)	Baseline Actual Emissions (TPY)	Projected Actuals (TPY)	Post-Project PTE (TPY)	Change (TPY)
PM ₁₀	24-Month Period:						
PM ₁₀ Change:							0

*Unaffected emissions units are not required to be listed individually. By choosing not to list unaffected emissions units, the applicant asserts that all emissions units not listed in Table 24.A will not be modified or experience an increase in actual annual emissions as part of the proposed project.

25.B. Creditable Contemporaneous Changes

Contemporaneous Period:	
-------------------------	--

EPN	Description	A	B	C	D	E	F
		Date of Modification	Pre-Project Allowables (TPY)	Baseline Actual Emissions (TPY)	24-Month Period (TPY)	Post-Project PTE (TPY)	Change (TPY)
PM ₁₀							
PM ₁₀ Change:							0

25.C. BACT/LAER Summary

For each source identified as "New" or "Modified" in Section 24.A, complete the following table for each pollutant that will trigger NSR. If LAER is not required per LAC 33:III.504.D.3, indicate such.

EPN	Pollutant	BACT/LAER	Limitation	Averaging Period	Description of Control Technology/Work Practice Standard(s)

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that proper record-keeping is essential for the transparency and accountability of the organization. The text also mentions the need for regular audits to ensure that the records are up-to-date and correct.

2. The second part of the document outlines the procedures for handling financial matters. It details the steps involved in budgeting, spending, and reporting. The text stresses the importance of adhering to established financial policies and procedures to avoid any mismanagement of funds.

3. The third part of the document focuses on the role of the management team in overseeing the organization's operations. It highlights the need for clear communication and collaboration between all levels of the organization to achieve the common goals.

4. The fourth part of the document addresses the issue of risk management. It discusses the various risks that the organization may face and provides strategies to mitigate these risks. The text also mentions the importance of having a contingency plan in place to deal with any unforeseen circumstances.

5. The fifth part of the document discusses the importance of maintaining a strong relationship with the stakeholders. It emphasizes the need for regular communication and engagement with the stakeholders to ensure that their interests are protected and their concerns are addressed.

6. The sixth part of the document outlines the steps for implementing the organization's strategy. It details the various initiatives and projects that need to be undertaken to achieve the organization's vision and mission.

7. The seventh part of the document discusses the importance of monitoring and evaluating the organization's performance. It emphasizes the need for regular reviews and assessments to identify areas of improvement and to ensure that the organization is on track to achieve its goals.

8. The eighth part of the document outlines the steps for ensuring the organization's long-term sustainability. It discusses the various factors that can impact the organization's future and provides strategies to ensure its continued success.

9. The ninth part of the document discusses the importance of maintaining a strong ethical culture. It emphasizes the need for all employees to adhere to the organization's code of ethics and to act with integrity and honesty.

10. The tenth part of the document discusses the importance of maintaining a strong relationship with the community. It emphasizes the need for the organization to be socially responsible and to contribute to the well-being of the community.

11. The eleventh part of the document outlines the steps for ensuring the organization's compliance with all applicable laws and regulations. It discusses the various legal requirements that the organization must follow and provides strategies to ensure compliance.

12. The twelfth part of the document discusses the importance of maintaining a strong relationship with the media. It emphasizes the need for the organization to be transparent and to provide accurate information to the media.

13. The thirteenth part of the document outlines the steps for ensuring the organization's financial stability. It discusses the various financial metrics that the organization must monitor and provides strategies to ensure financial health.

14. The fourteenth part of the document discusses the importance of maintaining a strong relationship with the government. It emphasizes the need for the organization to be engaged with the government and to advocate for its interests.

15. The fifteenth part of the document outlines the steps for ensuring the organization's overall success. It discusses the various factors that can impact the organization's performance and provides strategies to ensure long-term success.

25.D. PSD Air Quality Analyses Summary

		A	B	C	D	E	F	G	H	I	J	K
Pollutant	Averaging Period	Preliminary Screening Concentration (µg/m³)	Level of Significant Impact (µg/m³)	Significant Monitoring Concentration (µg/m³)	At the Monitoring Station		Background (µg/m³)	Maximum Modeled Concentration	Modeled + Background Concentration (µg/m³)	NAAQS (µg/m³)	Modeled PSD Increment Consumption (µg/m³)	Allowable Class II PSD Increment (µg/m³)
					Monitored Values (µg/m³)	Modeling Results						
PM ₁₀	24-hour		5	10						150		30
	Annual		1	-						50		17
SO ₂	3-hour		25	-						1300		512
	24-hour		5	13						365		91
	Annual		1	-						80		20
NOx	Annual		1	14						100		25
CO	1-hour		2000	-						40000		-
	8-hour		500	575						10000		-
Pb	3-month		-	0.1						1.5		-



25.E Nonattainment New Source Review Offsets [LAC 33:III.517.D.16, LAC 33:III.504.D.4 & 5]

Complete this section only if the proposed project triggers Nonattainment New Source Review (NNSR).

☐ N/A

This project triggers NNSR review for:

☐ NO_x☐ VOC**NO_x:**

Is the applicant proposing to use internal offsets?		<input type="radio"/> Yes <input checked="" type="radio"/> No
If not, identify the source of the offsets.	Company:	
	Facility/Unit:	
	Permit No.:	
Is an ERC Bank Application included with this application, or has an application already been submitted to LDEQ?		<input type="radio"/> Yes <input checked="" type="radio"/> No
If the ERC application has already been submitted, give the date:		
Identify the emissions units from which the offsets will be obtained (reference specific Emission Point ID numbers).		

VOC:

Is the applicant proposing to use internal offsets?		<input type="radio"/> Yes <input checked="" type="radio"/> No
If not, identify the source of the offsets.	Company:	
	Facility/Unit:	
	Permit No.:	
Is an ERC Bank Application included with this application, or has an application already been submitted to LDEQ?		<input type="radio"/> Yes <input checked="" type="radio"/> No
If the ERC application has already been submitted, give the date:		
Identify the emissions units from which the offsets will be obtained (reference specific Emission Point ID numbers).		

In order to expedite processing, please be sure the ERC Bank Application is completed properly. In the case of NO_x, the document should clearly differentiate between ozone season and non-ozone season actual emissions during the baseline period. Regarding NO_x and VOC, be sure to indicate if a portion of the reductions are no longer surplus (e.g., due to new or revised federal or state regulations, use in a netting analysis, etc.).

25.F. Economic Impact

Answer the following questions.

How many temporary jobs will be added as a result of this project?	
How many permanent jobs will be added as a result of this project?	

25.G Notification of Federal Land Manager [LAC 33:III.504.E.1, LAC 33:III.509.P.1]

Complete this section only if the proposed project triggers NNSR or PSD.

a. Is the proposed facility or modification located within 100 kilometers of a Class I Area?	<input type="radio"/> Yes <input checked="" type="radio"/> No
If Yes, determination of Q/d is not required; skip to the next question. If No, complete the Q/d equation below:	
<div style="display: flex; align-items: center; justify-content: space-between;"><div style="flex: 1;">$Q/d = \frac{PM_{10(NEI)} + SO_{2(NEI)} + NO_{X(NEI)} + H_2SO_{4(NEI)}}{\text{Class I km}}$</div><div style="flex: 1; text-align: right;"><div style="display: flex; justify-content: space-between;"><div>$PM_{10(NEI)}$</div>$=$<div>net emissions increase of $PM_{10}^{1,2}$</div></div><div style="display: flex; justify-content: space-between;"><div>$SO_{2(NEI)}$</div>$=$<div>net emissions increase of $SO_2^{1,2}$</div></div><div style="display: flex; justify-content: space-between;"><div>$NO_{X(NEI)}$</div>$=$<div>net emissions increase of $NO_X^{1,2}$</div></div><div style="display: flex; justify-content: space-between;"><div>$H_2SO_{4(NEI)}$</div>$=$<div>net emissions increase of $H_2SO_4^{1,2}$</div></div><div style="display: flex; justify-content: space-between;"><div>Class I km</div>$=$<div>distance to nearest Class I Area³</div></div></div></div> <div style="margin-top: 10px;">$Q/d = \underline{\hspace{10em}} =$</div>	
If Q/D < 4, proceed to Section 26. If Q/D ≥ 4, complete the remainder of this Section.	
b. Has the applicant provided a copy of the application to the Federal Land Manager?	<input type="radio"/> Yes <input checked="" type="radio"/> No
c. Does the application contain modeling that demonstrates no adverse impact on Air Quality Related Values (AQRVs) in the Class I Area?	<input type="radio"/> Yes <input checked="" type="radio"/> No
d. If Yes, indicate the model used: <input type="checkbox"/> VISCREEN <input type="checkbox"/> PLUVUE II <input type="checkbox"/> CALPUFF <input type="checkbox"/> Other ⁴ :	
e. Has the Federal Land Manager concurred that the proposed project will not adversely impact any AQRVs? If Yes, please attach correspondence.	<input type="radio"/> Yes <input checked="" type="radio"/> No
¹ If the net emissions increase of any pollutant is negative, enter "0." ² If the project did not trigger a netting analysis, use the project increase. In this case, the value will be less than the pollutant's significance level. ³ In kilometers. ⁴ Model must be approved by LDEQ and the Federal Land Manager.	



26. Environmental Assessment Statement (EAS or "IT" Question Responses) [La. R.S. 30:2018]

This section is required when applying for new Part 70 operating permits and/or major modifications. Any applications for these permit types that do not include answers to these questions will not be considered to be administratively complete.

☐ Yes ☒ No

For new Part 70 operating permits and/or major modifications, answers to these questions must be provided by the applicant to the local governmental authority and the designated public library at no additional costs to these entities. Consult instructions to determine what is considered to be a "local governmental authority" and a "designated public library". Indicate the name and address of the local governmental authority and the designated public library to which the answers to these questions were sent:

Name of Local Governing Authority			Name of Designated Public Library		
Street or P.O. Box			Street or P.O. Box		
City	State	Zip Code	City	State	Zip Code

Answer the following five questions on separate pages using full and complete answers. Include as many pages as necessary in order to provide full and complete answers. This information is required per Louisiana Revised Statutes 30:2018 (La. R.S. 30:2018).

Question 1: Have the potential and real adverse environmental effects of the proposed facility been avoided to the maximum extent possible? (This question requires the permittee to identify adverse environmental effects, both potential and real.)

Question 2: Does a cost benefit analysis of the environmental impact costs balanced against the social and economic benefits of the proposed facility demonstrate that the latter outweighs the former? (This question requires the permittee to perform a cost-benefit analysis, or at least a quantitative indication of the economic benefits and a qualitative description of the negative impacts expected from the permittee's operation. The latter should come from the answer to Question 1.)

Question 3: Are there alternative projects which would offer more protection to the environment than the proposed facility without unduly curtailing non-environmental benefits? (This question requires the permittee to demonstrate having considered alternate technologies.)

Question 4: Are there alternative sites which would offer more protection to the environment than the proposed facility site without unduly curtailing non-environmental benefits? (This is the question that deals directly with siting criteria.)

Question 5: Are there mitigating measures which would offer more protection to the environment than the facility as proposed without unduly curtailing non-environmental benefits? (This question requires the permittee to demonstrate having considered the most stringent techniques for reducing or more efficiently handling waste.)

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PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

Instructions: Complete this checklist and submit with the completed air permit application.

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit Application	Yes	No	N/A	Location Within the Permit Application
517.A Timely Submittal	Was a Copy of the Application Also Submitted to EPA?	●	○	○	NA
517.B.1,2 Certification	Does the Application include a Certification by a Responsible Official?	●	○	○	Section 3, Item 10
517.B.3 Certification	Does the Application Include Certification by a Professional Engineer or their Designee?	●	○	○	Section 3, Item 10
517.D.1 Identifying Information	Does the Application Include:				
	1. Company Name, Physical and Mailing Address of Facility?	●	○	○	Section 3, Item 2
	2. Map showing Location of the Facility?	●	○	○	Figure 1
	3. Owner and Operator Names and Agent?	●	○	○	Section 3, Item 1
	4. Name and Telephone Number of Plant Manager or Contact?	●	○	○	Section 3, Item 10
517.D.2 SIC Codes, Source Categories	Does the Application Include a Description of the Source's Processes and Products?	●	○	○	Section 1.3
	Does the Application Include the Source's SIC Code?	●	○	○	Section 3, Item 5
	Does the Application Include EPA Source Category of HAPs if applicable?	○	○	●	
517.D.3,6 EIQ Sheets	Has an EIQ Sheet been Completed for each Emission Point whether an Area or Point Source?	●	○	○	Section 5
517.D.4 Monitoring Devices	Does the Application Include Identification and Description of Compliance Monitoring Devices or Activities?	○	○	●	
517.D.5 Revisions and Modifications Only	For Revisions or Modifications, Does the Application include a Description of the Proposed Change and any Resulting Change in Emissions?	○	○	●	
517.D.7 General Information	Does the Application Include Information Regarding Fuels, Fuel Use, Raw Materials, Production Rates, and Operating Schedules as necessary to substantiate emission rates?	●	○	○	Section 5
517 D.8 Operating Limitations	Has Information Regarding any Limitations on Source Operation or any Applicable Work Practice Standards been Identified?	●	○	○	Section 4
517.D.9 Calculations	Are Emission Calculations Provided?	●	○	○	Section 6
517.D.10 Regulatory Review	Does the Application Include a Citation and Description of Applicable Louisiana and Federal Air Quality Requirements and Standards?	●	○	○	Section 4
517.D.11 Test Methods	Has a Description of or a Reference to Applicable Test Methods Used to Determine Compliance with Standards been Provided?	○	○	●	
517.D.12 Major Sources of TAPs	Does the Application include Information Regarding the Compliance History of Sources Owned or Operated by the Applicant (per LAC 33.III.5111)?	○	○	●	
517.D.13 Major Sources of TAPs	Does the Application include a Demonstration to show that the Source Meets all Applicable MACT and Ambient Air Standard Requirements?	○	○	●	

1. The first part of the document is a letter from the President of the United States to the Congress.

2. The second part is a report from the Secretary of the Treasury on the state of the Union.

3. The third part is a report from the Secretary of the Navy on the state of the Navy.

4. The fourth part is a report from the Secretary of the War on the state of the War.

5. The fifth part is a report from the Secretary of the Interior on the state of the Interior.

6. The sixth part is a report from the Secretary of the Agriculture on the state of the Agriculture.

7. The seventh part is a report from the Secretary of the Commerce on the state of the Commerce.

8. The eighth part is a report from the Secretary of the Education on the state of the Education.

9. The ninth part is a report from the Secretary of the Health on the state of the Health.

10. The tenth part is a report from the Secretary of the Labor on the state of the Labor.

11. The eleventh part is a report from the Secretary of the Finance on the state of the Finance.

PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

Instructions: Complete this checklist and submit with the completed air permit application.

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit Application	Yes	No	N/A	Location Within the Permit Application
517.D.14 PSD Sources Only	If Required by DEQ, Does the Application Include Information Regarding the Ambient Air Impact for Criteria Pollutants as Required for the Source Impact Analysis per LAC 33:III.509.K, L, and M?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.D.15 PSD Sources Only	If Required by DEQ, Does the Application Include a Detailed Ambient Air Analysis?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.D.16, 18	Has any Additional Information been Provided?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.D.17 Fees	Has the Fee Code been Identified?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Section 3, Item 5
	Is the Applicable Fee Included with the Application?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Attached
517.E.1 Additional Part 70 Requirements	Does the Certification Statement Include a Description of the Compliance Status of Each Emission Point in the Source with All Applicable Requirements?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Section 3, Item 10
517.E.2 Additional Part 70 Requirements	Does the Certification Statement Include a Statement that the Source will continue to Comply with All Applicable Requirements with which the Source is in Compliance?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Section 3, Item 10
517.E.3 Additional Part 70 Requirements	Does the Certification Statement Include a Statement that the Source will, on a timely basis, meet All Applicable Requirements that will Become Effective During the Permit Term?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Section 3, Item 10
517.E.4 Additional Part 70 Requirements	Are there Applicable Requirements for which the Source is not in Compliance at the Time of Submittal?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
	Does the Application include a Compliance Plan Schedule?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
	Does the Schedule Include Milestone Dates for which Significant Actions will occur?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
	Does the Schedule Include Submittal Dates for Certified Progress Reports?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.E.5 Additional Part 70 Requirements Acid Rain	Is this Source Covered by the Federal Acid Rain Program?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
	Are the Requirements of LAC 33:III.517.E 1-4 included in the Acid Rain Portion of the Compliance Plan?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.E.6 Additional Part 70 Requirements	Have any Exemptions from any Applicable Requirements been Requested?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
	Is the List and explanations Provided?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.E.7 Additional Part 70 Requirements	Does the Application Include a Request for a Permit Shield?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
	Does the Request List those Federally Applicable Requirements for which the Shield is Requested along with the Corresponding Draft Permit Terms and conditions which are Proposed to Maintain Compliance?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.E.8 Additional Part 70 Requirements	Does the Application Identify and Reasonably Anticipated Alternative Operating Scenarios?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
	Does the Application include Sufficient Information to Develop permit Terms and Conditions for Each Scenario, Including Source Process and Emissions Data?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	



PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

Instructions: Complete this checklist and submit with the completed air permit application.

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit Application	Yes	No	N/A	Location Within the Permit Application
517.F Confidentiality	Does the Application Include a Request for Non-Disclosure (Confidentiality)?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
525.B. Minor Permit Modifications	Does the Application Include a Listing of New Requirements Resulting from the Change?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
	Does the Application Include Certification by the Responsible Official that the Proposed Action Fits the Definition of a Minor Modification as per LAC 33:III.525.A.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
	Does the Certification also Request that Minor Modification Procedures be Used?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
	Does the Application, for Part 70 Sources, Include the Owner's Suggested Draft Permit and Completed Forms for the Permitting Authority to Use to Notify Affected States?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
La. R.S. 30:2018 -- PSD/NNSR only	Has a copy of the answers to the questions posed in the Environmental Assessment Statement (Section 26) been sent to the local governing authority at no cost to the local governing authority?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
	Has a copy of the answers to the questions posed in the Environmental Assessment Statement (Section 26) been sent to the designated public library at no cost to the designated public library?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	



SECTION 4.0

APPLICABLE REGULATIONS, AIR POLLUTION CONTROL MEASURES, MONITORING, AND RECORDKEEPING



CATHYVAL PLANT - I
RHOF
BATON ROUGE, EAST BATON ROUGE

TABLE 1: APPLICABLE LOUISIANA AND

Source ID No:	TEMPO ID	Descriptive Name of Source	NSPS 40 CFR 60							NESHAP S 40 CFR			NESHAP PS CFR		
			A	Ka	Kb+	VV	III	NNN	RRR	YYY	A	M	FF	A	FF
C-501	EQT037	Solvent 2 Distillation Surge Tank													
C-504	EQT211	Vanillin/Solvent 2 Atmospheric Distillation Column													
C-507	EQT212	Vanillin/Solvent 2 Vacuum Distillation Column													
C-516	EQT213	Solvent 2 Cold Trap													
C-533X	EQT214	Solvent 2 Vacuum Package Separator													
C-558	EQT038	Aqueous Effluents Tank													
C-565	EQT215	Solvent 2 Recovery Column (Aqueous Phase Stripper)													
C-568	EQT216	Solvent 2 Recovery Column (Top Rectification)													
C-575	EQT039	Solvent 2 Recovery Decanter													
E-428	EQT217	Condenser													
H-520	EQT218	Vacuum System													
107	EQT0040	Distillation Scrubber C-557													
C-525	EQT219	Tars Removal Column													
C-529	EQT220	Tars By-Pass Tank													
C-535	EQT041	Tars Surge Tank													
C-545	EQT221	Lights Removal Column													
C-555A/B	EQT222	Vanillin Cold Traps													
C-562X	EQT223	Vanillin Purification Vacuum Package Separator													
C-616	EQT042	Flaker Surge Tank													
C-648	EQT043	Recycle Product Hopper Melter													
C-655	EQT044	Melter Surge Tank													
H-556	EQT224	Vacuum System													
108	EQT0045	Crystallization Scrubber C-624													
C-541	EQT046	Methanol Washing Drum (Vents through C-801)													
C-603	EQT048	Dissolver													
C-606	EQT049	Vacuum Crystallizer													
C-617	EQT050	Centrifuge Surge Tank													
C-634X	EQT225	Dryer Scrubber													
C-637X	EQT226	Crystallization Vacuum Package Separator													
C-640	EQT227	Dryer													
C-801	EQT047	Solvent 3 Recovery Feed Tank													
C-805	EQT228	Solvent 3 Recovery Column													
H-619	EQT229	Vacuum System													
Y-620	EQT230	Centrifuge A													
Y-621	EQT231	Centrifuge B													
Y-640	EQT232	Dryer													
109	EQT0051	Baghouse Filter / Scrubber C-704													
110	EQT139	High Purity PC Mixing Vessel													
111	new	Oxidation Vent													
C-407	EQT206	Oxidation Reactor													

FEDERAL AIR QUALITY REQUIREMENTS

e 4-2

CATHYVAL PLANT - I
RHOF
BATON ROUGE, EAST BATON

TABLE 1: APPLICABLE LOUISIANA AN

Source ID No:	TEMPO ID	Descriptive Name of Source	NSPS 40 CFR 60							NESHAP S 40 CFR			NES PS CFR	
			A	Ka	Kb+	VV	III	NNN	RRR	YYY	A	M	FF	A
C-409	EQT029	Mandelate Surge Tank												
C-416	EQT207	Oxidation Column												
D-417	EQT030	Oxidation Surge Tank			2									
201	EQT0052	Tank Farm Scrubber C-146												
D-111	EQT053	Pyrocatechol Storage Tank			2									
D-128	EQT054	Tars Storage Tank												
D-141	EQT055	Veratrole Storage Tank												
202	EQT0056	Vent Scrubber C-685												
C-201	EQT057	PC Dissolution Tank												
C-553	EQT058	Guaiacol Distillation Feed Tank												
C-561	EQT059	Recycle Process Water Tank												
C-603	EQT060	Guaiacol Distillation Tank												
C-606	EQT233	Guaiacol Distillation Column												
C-615	EQT061	Tars Receiver												
C-645	EQT062	PMDB Receiver												
C-651	EQT063	PC Receiver												
C-655	EQT064	Guiacol Light Ends Receiver												
C-660	EQT065	Inters./Veratrole Receiver												
C-665	EQT066	Second Receiver												
C-670	EQT067	End of Campaign Receiver												
C-675	EQT068	Guaiacol Receiver												
C-683X	EQT234	Guaiacol Vacuum Package Separator												
C-687A/B	EQT235	Guaiacol Distillation Cold Traps												
C-701	EQT069	Crude Veratrole Wash Tank												
C-705	EQT070	Water Guaiacolate Receiver												
C-710	EQT071	Caustic Wash Receiver												
C-751	EQT072	Veratrole Distillation Kettle												
C-754	EQT236	Veratrole Distillation Column												
C-765	EQT073	Light Ends Receiver												
C-770	EQT074	Distilled Veratrole Receiver												
C-783X	EQT237	Veratrole Vacuum Separator												
C-787	EQT238	Veratrole Distillation Cold Traps												
203	EQT0075	Baghouse for HQ/PC Handling												
301	EQT0076	Phenolic Reactors Vent Scrubber C-209												
C-213	EQT239	First Reactor												
C-215	EQT240	Second Reactor (vents indirectly via 1st reactor)												
C-217	EQT241	Third Reactor (vents indirectly via 1st reactor)												
C-219	EQT242	Fourth Reactor (vents indirectly via 1st reactor)												
C-223	EQT077	Phenol Drain Tank Reaction Surge Drum												
C-231	EQT243	Fifth Reactor (vents indirectly via 1st reactor)												
C-416	EQT078	Predephenol Reflux Drum												
C-501	EQT244	Detarring Column, vents via H-524												
C-508	EQT079	Vertical Tar Diluter												

FEDERAL AIR QUALITY REQUIREMENTS

e 4-3

TABLE 1: APPLICABLE LOUISIANA AN

Source ID No:	TEMPO ID	Descriptive Name of Source	NSPS 40 CFR 60							NESHAP S 40 CFR			NESHAP PS 40 CFR	
			A	Ka	Kb+	VV	III	NNN	RRR	YYY	A	M	FF	A
C-521	EQT245	Final Dephenoling Column, vents via H-524												
C-530	EQT080	Distillation Drain Tank												
C-532	EQT081	Tails Surge Drum												
E-418	EQT246	Phenol Condenser												
E-506	need	Detarring Condenser												
H-524	EQT247	Vacuum System												
302	EQT0082	OSBL Tank Farm Scrubber C-319												
C-113	EQT083	Phenol Unloading Tank												
D-107	EQT084	Washwater Tank			2									
D-111	EQT085	Phenol Make-Up Tank			2									
D-115	EQT086	Washwater/Guaiacol Tank			2									
D-204	EQT088	Recycle Phenol Tank												
D-315	EQT087	Raffinate Tank												
E-318	need	Predephenoling Vent Condenser												
303	EQT0089	IPE Solvent Vent Scrubber C-402												
C-301	EQT248	Water Stripper, vents via E-401												
C-308	EQT091	IPE Settler												
C-311	EQT092	Wash Water Drum												
C-313	EQT249	Extraction Column, vents via E-401												
C-320	EQT090	IPE Storage Tank												
C-322	EQT093	Ether Drain Tank												
C-405	EQT250	Dehydration Column, vents via E-408 and E-401												
E-401	EQT251	Solvent Vent Condenser												
304	EQT0094	PC Flaker Vent Scrubber C-561												
C-536	EQT252	Splitter Column (PC/HQ Separation), vents via H-545												
C-551	EQT095	PC Receiving Drum												
C-563	EQT096	PC Flaker Feed Tank												
H-545	EQT253	Vacuum System												
S-560	EQT254	PC Flaker (Intermittent, for S/D only)												
306	EQT0097	Seal Pot D-669 for Crystallization												
C-650	EQT098	Reflux Surge Drum												
D-607	EQT099	HQ Dissolver Tank												
D-610	EQT100	HQ Surge Tank												
D-612	EQT101	Carbon Treater Tank												
D-632	EQT102	Crystallization Surge Tank												
D-652	EQT103	Mother Liquor Surge Tank												
D-653	EQT104	Conc. Column Feed Tank												
D-657	EQT105	Mother Liquor Surge Drum												
D-681	EQT137	Screener Residue Dissolver												
H-640	EQT256	Vacuum System for Crystallizers												
307	EQT0106	Sulfite Metabisulfite Bag Dump Station Baghouse S-603 for D601												
308	EQT0107	Oxalic Acid Bag Dump Station Baghouse S-663 for D660												

FEDERAL AIR QUALITY REQUIREMENTS

e 4-4

TABLE 1: APPLICABLE LOUISIANA AN

Source ID No:	TEMPO ID	Descriptive Name of Source	NSPS 40 CFR 60							NESHAP S 40 CFR			NESHAP PS 4 CFR	
			A	Ka	Kb+	VV	III	NNN	RRR	YYY	A	M	FF	A
310	EQT0109	Carbon Bag Dump Station Baghouse S-615 for D618												
311	EQT0110	PC Packaging Baghouse Y-731												
312	EQT0111	HQ Packaging Baghouse Y-716												
313	EQT0112	HQ Rework Dumper Baghouse S-693												
316	EQT0115	Pressure Leaf Filter Drying Vent Y-625												
317	EQT0116	Vacuum Clean-Up Packaging Baghouse Y-760X												
315A	EQT0113	Fluid Heater F-962 (Back-up)												
315B	EQT0114	Primary Fluid Heater F-971												
F-6C	FUG0004	Cathyval Fugitive Emissions (Cathy Unit)				1								
F-6D	FUG0005	Cathyval Fugitive Emissions (Daphne Unit)				2								
F-6V	FUG0001	Cathyval Fugitive Emissions (Vanessa Unit)				2								
M-5	EQT0125	Cathy (E925) and Vanessa (E907) Cooling Towers												
M-6	EQT0126	CathyVal Sumps												
WWT	GRP0014	Emissions CAP - Wastewater Treatment Plant												
2, 3	GRP0002	Sulfuric Acid Units No. 1 and No. 2 *												
C-101	EQT127	IPE Solvent Storage Tank												
C-132	EQT133	MeCl Storage Tank												
C-136	EQT134	EtCl Storage Tank												
C-251	EQT255	Batch Reactor												
C-301	EQT135	Acidification/Decantation Tank												
C-351	EQT128	RAG Layer Diverting Tank												
C-352	EQT130	RAG Layer Surge Tank												
C-401	EQT129	Aqueous Phase Surge Tank												
C-451	EQT257	Extraction Column												
C-461	EQT131	Aqueous Effluent Tank												
C-501	EQT258	Deetheration Column												
C-503	EQT136	Deetheration IPE Decanter												
C-511	EQT259	Deetheration Guaiacol Decanter												
C-521	EQT132	Organic Phase Surge Tank												
C-551	EQT260	Crude Guaiacol Dehydration Column												
C-555	EQT261	Wet Guaiacol Tank												

* Sulfuric Acid Unit No. 1 (EIQ I.D. 3) and Sulfuric Acid Unit No. 2 (EIQ I.D. 2) are included in a separate Title V permit 0840-00
+ Vessels with a blank for NSPS Kb are "process tanks" per NSPS Kb definition and/or are less than 19,800 gals such that Kb
Vessels with a "2" are potentially subject to NSPS Kb, but are not currently subject due to vapor pressure of stored material.

KEY TO MATRIX

- 1 (Applicable) The regulations have applicable requirements that apply to this particular emissions source. This includes any m
- 2 (Exempt) The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not a
- 3 (Does Not Apply) The regulations do not apply to this emissions source. The regulations may have applicable requirements t

Blank – The regulations clearly do not apply to this type of emission source.

ATON ROUGE FACILITY
A, INC.
N ROUGE PARISH, LOUISIANA

FEDERAL AIR QUALITY REQUIREMENTS

A 3 F	40 CFR 64	40 CFR 68	40 CFR 70	40 CFR 82	LAC 33:III												LAC 33:III.Chapter				
					1303. B	1311. B	1311. C	1313. C	2103	2107	2111	2113	2115	2147	2149	2153	9	11	51	56	59
						1	2														
						1	2														
						1	2														
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033-V2 issued 11-30-09.
would not apply regardless of contents.

monitoring, recordkeeping, or reporting requirements.
apply to this particular emission source.

that could apply to this emissions source but the requirements do not currently apply to the source due to meeting a specific criterion, such as

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TABLE 2: AIR POLLUTION CONTROL MEASURES

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
Facility	GRP0011		LAC 33:III.Chapter 9	<i>Requirements that specify reports to be submitted -</i>			
				Submit annual emission inventory reports to the Office of Environmental Assessment by March 31 of each year (for the previous calendar year).	LAC 33:III.919	Annual	no
				The unauthorized discharge of any air pollutant into the air shall be reported in accordance with the provisions of LAC 33:I.Chapter 39.	LAC 33:III.927	--	no
			LAC 33:III.Chapter 11	<i>Requirements that limit emissions or operations -</i>			
				Emissions of smoke which passes onto or across a public road and creates a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensifies an existing traffic hazard condition is prohibited.	LAC 33:III.1103	N/A	no
				Outdoor burning is prohibited.	LAC 33:III.1109	N/A	no
			LAC 33:III.Chapter 13	<i>Requirements that limit emissions or operations -</i>			
				Emissions of particulate matter which pass onto or across a public road and create a traffic hazard are prohibited.	LAC 33:III.1303.B	N/A	no
Facility	GRP0011		LAC 33:III.Chapter 21	<i>Requirements that limit emissions or operations -</i>			
				Best practical housekeeping and maintenance practices must be maintained at the highest possible standards to reduce the quantity of organic compounds emissions. Emission of organic compounds must be reduced wherever feasible. Good housekeeping includes the practices listed in LAC 33:2113.A.1 - 5. Develop written plan for VOC housekeeping and maintenance placing emphasis on the prevention or reduction of VOC emissions from the facility.	LAC 33:III.2113	N/A	no

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
Facility	GRP0011		LAC 33:III.Chapter 51	<i>Requirements that limit emissions or operations -</i>			
				After December 20, 1991, no owner or operator of any major source shall cause a violation of any ambient air standard listed in LAC 33:III.5112, Table 51.2, unless operating in accordance with LAC 33:III.5109.B.	LAC 33:III.5105.A.2	--	yes
			LAC 33:III.Chapter 51	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Demonstrate compliance with the applicable Ambient Air Standards (AAS) for TAPs with emissions higher than the applicable MER. Emissions of MIBK are higher than the MER. Modeling report submitted March 2005 demonstrating compliance.	LAC 33:III.5109.B	--	yes
				<i>Requirements that specify reports to be submitted -</i>			
				Submit a completed annual emissions report identifying the quantity of emissions in the previous calendar year for any TAP emitted.	LAC 33:III.5107.A	Annual	yes
				Submit discharge reports for discharges which cause emergency conditions, unauthorized discharges, and control device bypass discharges as specified in this subsection.	LAC 33:III.5107.B	N/A	yes
			LAC 33:III.Chapter 56	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Develop and maintain standby plans for emission reductions during emergency episodes.	LAC 33:III.5609	N/A	no
				<i>Requirements that specify reports to be submitted -</i>			
				Standby plans as required by this Section shall be available to the administrative authority upon request. Any company asked to furnish a standby plan to the administrative authority shall have 30 days from the date of request to submit a plan.	LAC 33:III.5611	N/A	no
			LAC 33:III.Chapter 59	<i>Requirements that limit emissions or operations -</i>			
				Have a chemical accident prevention and minimization program as required in this part.	LAC 33:III.5907	--	no

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
Facility	GRP0011		40 CFR 68	<i>Requirements that specify reports to be submitted -</i> Have a chemical accident prevention and minimization program as required in this part.	40 CFR 68	--	no
			40 CFR 70	<i>Requirements that specify reports to be submitted -</i> Submit Title V monitoring reports and excess emission reports.	40 CFR 70.6(a)(3)(iii)(A)	semiannual	no
				Submit annual Title V certification.	40 CFR 70.6(c)(5)(iv)	annual	no
				<i>Requirements that limit emissions or operations -</i> Comply with applicable provisions of protection of stratospheric ozone.	40 CFR 82	--	no
			40 CFR 82	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
D-148	EQT010	101	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
D-149	EQT011	101	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
D-152	EQT012	101	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
D-153	EQT013	101	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
D-169	EQT014	101	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that limit emissions or operations -</i> Equip with submerged fill pipe.	LAC 33:III.2103.A	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
D-107	EQT0016	102	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
D-111	EQT0017	102	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
D-113	EQT0018	102	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no

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TABLE 2: AIR POLLUTION CONTROL MEASURES

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
C-202	EQT188	103	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-207	EQT189	103	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-216	EQT020	103	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
C-217	EQT190	103	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-219	EQT191	103	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-221	EQT192	103	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-223	EQT193	103	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-225	EQT194	103	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-227	EQT195	103	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement			
C-236	EQT022	104	LAC 33:III Chapter 21 - Storage of VOCs	Requirements that specify records to be kept and requirements that specify record retention time - Keep records specified in LAC 33:III.2103.I.				LAC 33:III.2103.I	--	no
C-240	EQT023	104	LAC 33:III Chapter 21 - Storage of VOCs	Requirements that specify records to be kept and requirements that specify record retention time - Keep records specified in LAC 33:III.2103.I.				LAC 33:III.2103.I	--	no
C-241	EQT196	104	LAC 33:III Chapter 21 - Waste Gas Disposal	Requirements that specify records to be kept and requirements that specify record retention time - Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.				LAC 33:III.2115.K.4	--	no
C-243	EQT024	104	LAC 33:III Chapter 21 - Waste Gas Disposal	Requirements that specify records to be kept and requirements that specify record retention time - Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.				LAC 33:III.2115.K.4	--	no
C-244	EQT025	104	LAC 33:III Chapter 21 - Storage of VOCs	Requirements that specify records to be kept and requirements that specify record retention time - Keep records specified in LAC 33:III.2103.I.				LAC 33:III.2103.I	--	no
C-245	EQT197	104	LAC 33:III Chapter 21 - Waste Gas Disposal	Requirements that specify records to be kept and requirements that specify record retention time - Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.				LAC 33:III.2115.K.4	--	no
C-247	EQT027	104	LAC 33:III Chapter 21 - Waste Gas Disposal	Requirements that specify records to be kept and requirements that specify record retention time - Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.				LAC 33:III.2115.K.4	--	no

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
C-249	EQT026	104	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
C-301	EQT198	104	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-306	EQT199	104	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-312	EQT200	104	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-314	EQT201	104	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-316	EQT202	104	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-320	EQT203	104	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-322X	EQT204	104	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
H-317	EQT205	104	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no

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TABLE 2: AIR POLLUTION CONTROL MEASURES

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
106	EQT0031	106	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that limit emissions or operations -</i>			
				Equip with a vapor loss control system that is $\geq 95\%$ efficient for VOCs. This scrubber controls emissions from 4 tanks that are subject to LAC 33:III.2103.A. Overall $\geq 95\%$ DRE is achieved by condenser and scrubber operating in series.	LAC 33:III.2103.A		no
			LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
				<i>Requirements that limit emissions or operations -</i>			
				Non-halogenated hydrocarbons shall be burned at 1600°F for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices will be accepted provided 98% or greater VOC destruction or removal efficiency can be demonstrated. Overall $\geq 98\%$ DRE is achieved by condenser E-428 and scrubber C-427 (EPN 106) operating in series. Does not apply when oxidation/neutralization section is shut down.	LAC 33:III.2115.B	--	no
C-421	EQT032	106	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify monitoring -</i>			
				Install and maintain monitors to accurately measure and record operation parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with the design specifications, including but not limited to the parameters listed in LAC 33:III.2115.J.2.	LAC 33:III.2115.J.2	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records as required in LAC 33:III.2115.K.	LAC 33:III.2115.K	--	no
				<i>Requirements that limit emissions or operations -</i>			
C-421	EQT032	106	LAC 33:III Chapter 21 - Storage of VOCs	Equip with a vapor loss control system .	LAC 33:III.2103.A	--	no
				Vapor loss control system shall reduce inlet emissions of VOC by $\geq 95\%$.	LAC 33:III.2103.E	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no

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TABLE 2: AIR POLLUTION CONTROL MEASURES

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
C-429	EQT208	106	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that limit emissions or operations -</i> Control of VOC by $\geq 98\%$ DRE achieved with condenser E-428 and scrubber C-427 (EPN 106) in series.	LAC 33:III.2115.B	--	no
C-430	EQT033	106	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that limit emissions or operations -</i> Control of VOC by $\geq 98\%$ DRE achieved with condenser E-428 and scrubber C-427 (EPN 106) in series.	LAC 33:III.2115.B	--	no
C-432	EQT034	106	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that limit emissions or operations -</i> Equip with a vapor loss control system .	LAC 33:III.2103.A	--	no
				Vapor loss control system shall reduce inlet emissions of VOC by $\geq 95\%$.	LAC 33:III.2103.E	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-434	EQT035	106	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-435	EQT209	106	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-440	EQT210	106	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-441	EQT036	106	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that limit emissions or operations -</i> Equip with a vapor loss control system .	LAC 33:III.2103.A	--	no
				Vapor loss control system shall reduce inlet emissions of VOC by $\geq 95\%$.	LAC 33:III.2103.E	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
C-501	EQT031	106	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that limit emissions or operations -</i> Equip with a vapor loss control system .	LAC 33:III.2103.A	--	no
				Vapor loss control system shall reduce inlet emissions of VOC by $\geq 95\%$.	LAC 33:III.2103.E	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
C-504	EQT211	106	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-507	EQT212	106	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-516	EQT213	106	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-533X	EQT214	106	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-558	EQT038	106	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
C-565	EQT215	106	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-568	EQT216	106	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-575	EQT039	106	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no

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TABLE 2: AIR POLLUTION CONTROL MEASURES

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
E-428	EQT031	106	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that limit emissions or operations -</i> Control of VOC by $\geq 98\%$ DRE achieved with condenser E-428 and scrubber C-427 (EPN 106) in series.	LAC 33:III.2115.B	--	no
H-520	EQT218	106	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-525	EQT219	107	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-529	EQT220	107	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-535	EQT041	107	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
C-545	EQT221	107	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-555A/B	EQT222	107	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-562X	EQT223	107	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-616	EQT042	107	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
C-648	EQT043	107	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-655	EQT044	107	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement					
H-556	EQT224	107	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.				LAC 33:III.2115.K.4	--	no		
108	EQT0045	108	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that limit emissions or operations -</i> Equip with a vapor loss control system that is ≥ 95% efficient for VOCs. This scrubber controls emissions from 2 tanks that are subject to LAC 33:III.2103.A.						LAC 33:III.2103.A		no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.						LAC 33:III.2103.I	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.						LAC 33:III.2115.K.4	--	no
C-541	EQT046	108	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.						LAC 33:III.2115.K.4	--	no
C-603	EQT048	108	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.						LAC 33:III.2115.K.4	--	no
C-606	EQT049	108	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.						LAC 33:III.2115.K.4	--	no
C-617	EQT050	108	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that limit emissions or operations -</i> Equip with a vapor loss control system .						LAC 33:III.2103.A	--	no
				Vapor loss control system shall reduce inlet emissions of VOC by ≥95%.						LAC 33:III.2103.E	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.						LAC 33:III.2103.I	--	no
C-634X	EQT225	108	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.						LAC 33:III.2115.K.4	--	no

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
C-637X	EQT226	108	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-640	EQT227	108	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-801	EQT047	108	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that limit emissions or operations -</i>			
				Equip with a vapor loss control system .	LAC 33:III.2103.A	--	no
				Vapor loss control system shall reduce inlet emissions of VOC by ≥95%.	LAC 33:III.2103.E	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
C-805	EQT228	108	LAC 33:III Chapter 21 - Waste Gas Disposal	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
H-619	EQT229	108	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
Y-620	EQT230	108	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
Y-621	EQT231	108	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
Y-640	EQT232	108	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
109	EQT0051	109	LAC 33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.B - Allowable Rate of Emissions Based on Process Weight Rate	<i>Requirements that limit emissions or operations -</i> Emissions of PM ₁₀ shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III Chapter 13.	LAC 33:III.1311.B	--	no
110	EQT0139	110	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-407	EQT206	111	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-409	EQT029	111	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
C-416	EQT207	111	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
D-417	EQT030	111	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
D-111	EQT053	201	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
D-128	EQT054	201	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
D-141	EQT055	201	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
C-201	EQT057	202	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	<i>Requirements that limit emissions or operations -</i> The required 90% control for the pool of non-exempt batch process vents is achieved by controlling C-251 and C-301 with >99% DRE.	LAC 33:III.2149.C.1	--	no
				Use the RACT equation specified in LAC 33:III.2149.C.1 as applicable.	LAC 33:III.2149.C.2.f	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records as defined in 2149.G.1	LAC 33:III.2149.G.1	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
C-553	EQT058	202	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
C-561	EQT059	202	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
C-603	EQT060	202	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	<i>Requirements that limit emissions or operations -</i> The required 90% control for the pool of non-exempt batch process vents is achieved by controlling C-251 and C-301 with >99% DRE.	LAC 33:III.2149.C.1	--	no
				Use the RACT equation specified in LAC 33:III.2149.C.1 as applicable.	LAC 33:III.2149.C.2.f	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records as defined in 2149.G.1	LAC 33:III.2149.G.1	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
C-606	EQT233	202	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	<i>Requirements that limit emissions or operations -</i> The required 90% control for the pool of non-exempt batch process vents is achieved by controlling C-251 and C-301 with >99% DRE.	LAC 33:III.2149.C.1	--	no
				Use the RACT equation specified in LAC 33:III.2149.C.1 as applicable.	LAC 33:III.2149.C.2.f	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records as defined in 2149.G.1	LAC 33:III.2149.G.1	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
C-615	EQT061	202	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
C-645	EQT062	202	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
C-651	EQT063	202	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement			
C-655	EQT064	202	LAC 33:III Chapter 21 - Storage of VOCs	Requirements that specify records to be kept and requirements that specify record retention time - Keep records specified in LAC 33:III.2103.I.				LAC 33:III.2103.I	--	no
C-660	EQT065	202	LAC 33:III Chapter 21 - Storage of VOCs	Requirements that specify records to be kept and requirements that specify record retention time - Keep records specified in LAC 33:III.2103.I.				LAC 33:III.2103.I	--	no
C-665	EQT066	202	LAC 33:III Chapter 21 - Storage of VOCs	Requirements that specify records to be kept and requirements that specify record retention time - Keep records specified in LAC 33:III.2103.I.				LAC 33:III.2103.I	--	no
C-670	EQT067	202	LAC 33:III Chapter 21 - Storage of VOCs	Requirements that specify records to be kept and requirements that specify record retention time - Keep records specified in LAC 33:III.2103.I.				LAC 33:III.2103.I	--	no
C-675	EQT068	202	LAC 33:III Chapter 21 - Storage of VOCs	Requirements that specify records to be kept and requirements that specify record retention time - Keep records specified in LAC 33:III.2103.I.				LAC 33:III.2103.I	--	no
C-683X	EQT234	202	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	Requirements that limit emissions or operations - The required 90% control for the pool of non-exempt batch process vents is achieved by controlling C-251 and C-301 with >99% DRE.				LAC 33:III.2149.C.1	--	no
				Use the RACT equation specified in LAC 33LIII.2149.C.1 as applicable.				LAC 33:III.2149.C.2.f	--	no
				Requirements that specify records to be kept and requirements that specify record retention time - Keep records as defined in 2149.G.1				LAC 33:III.2149.G.1	--	no
				Requirements that limit emissions or operations - The required 90% control for the pool of non-exempt batch process vents is achieved by controlling C-251 and C-301 with >99% DRE.				LAC 33:III.2149.C.1	--	no
C-687A/B	EQT235	202	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	Use the RACT equation specified in LAC 33LIII.2149.C.1 as applicable.				LAC 33:III.2149.C.2.f	--	no
				Requirements that specify records to be kept and requirements that specify record retention time - Keep records as defined in 2149.G.1				LAC 33:III.2149.G.1	--	no
				Requirements that specify records to be kept and requirements that specify record retention time - Maintain records for exempt sources as required in LAC 33:III.2149.G.1.				LAC 33:III.2149.G.1	--	no
				Requirements that specify records to be kept and requirements that specify record retention time - Keep records specified in LAC 33:III.2103.I.				LAC 33:III.2103.I	--	no
C-701	EQT069	202	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch	Requirements that specify records to be kept and requirements that specify record retention time - Keep records specified in LAC 33:III.2103.I.				LAC 33:III.2103.I	--	no
C-705	EQT070	202	LAC 33:III Chapter 21 - Storage of VOCs	Requirements that specify records to be kept and requirements that specify record retention time - Keep records specified in LAC 33:III.2103.I.				LAC 33:III.2103.I	--	no
C-710	EQT071	202	LAC 33:III Chapter 21 - Storage of VOCs	Requirements that specify records to be kept and requirements that specify record retention time - Keep records specified in LAC 33:III.2103.I.				LAC 33:III.2103.I	--	no

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C-751	EQT072	202	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch	Requirements that specify records to be kept and requirements that specify record retention time -			
				Maintain records for exempt sources as required in LAC 33:III.2149.G.1.	LAC 33:III.2149.G.1	--	no
C-754	EQT236	202	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch	Requirements that specify records to be kept and requirements that specify record retention time -			
				Maintain records for exempt sources as required in LAC 33:III.2149.G.1.	LAC 33:III.2149.G.1	--	no
C-765	EQT073	202	LAC 33:III Chapter 21 - Storage of VOCs	Requirements that specify records to be kept and requirements that specify record retention time -			
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
C-770	EQT074	202	LAC 33:III Chapter 21 - Storage of VOCs	Requirements that specify records to be kept and requirements that specify record retention time -			
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
C-783X	EQT237	202	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch	Requirements that specify records to be kept and requirements that specify record retention time -			
				Maintain records for exempt sources as required in LAC 33:III.2149.G.1.	LAC 33:III.2149.G.1	--	no
C-787	EQT238	202	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch	Requirements that specify records to be kept and requirements that specify record retention time -			
				Maintain records for exempt sources as required in LAC 33:III.2149.G.1.	LAC 33:III.2149.G.1	--	no
203	EQT0075	203	LAC 33:III Chaper 13 - Emission Standards for Particulate Matter; 1311.B - Allowable Rate of Emissions Based on Process Weight Rate	Requirements that limit emissions or operations -			
				Emissions of PM ₁₀ shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III Chapter 13.	LAC 33:III.1311.B	--	no

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
C-213	EQT239	301	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM I Reactor Processes and Distillation Operations	<i>Requirements that limit emissions or operations -</i> Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC 33:III.2147.D.1.	LAC 33:III.2147.C.2	--	no
				Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v	--	no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2	--	no
C-215	EQT240	301	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM I Reactor Processes and Distillation Operations	<i>Requirements that limit emissions or operations -</i> Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC 33:III.2147.D.1.	LAC 33:III.2147.C.2	--	no
				Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v	--	no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2	--	no

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
C-217	EQT217	301	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM I Reactor Processes and Distillation Operations	<i>Requirements that limit emissions or operations -</i> Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC 33:III.2147.D.1.	LAC 33:III.2147.C.2	--	no
				Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v	--	no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2	--	no
C-219	EQT242	301	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM I Reactor Processes and Distillation Operations	<i>Requirements that limit emissions or operations -</i> Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC 33:III.2147.D.1.	LAC 33:III.2147.C.2	--	no
				Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v	--	no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2	--	no

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
C-223	EQT077	301	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-231	EQT243	301	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM I Reactor Processes and Distillation Operations	<i>Requirements that limit emissions or operations -</i>			
				Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC 33:III.2147.D.1.	LAC 33:III.2147.C.2	--	no
				Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v	--	no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2	--	no
C-416	EQT078	301	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no

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TABLE 2: AIR POLLUTION CONTROL MEASURES

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
C-501	EQT244	301	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM Reactor Processes and Distillation Operations	<i>Requirements that limit emissions or operations -</i> Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC 33:III.2147.D.1.	LAC 33:III.2147.C.2	--	no
				Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v	--	no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2	--	no
C-508	EQT079	301	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no

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TABLE 2: AIR POLLUTION CONTROL MEASURES

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
C-521	EQT245	301	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM I Reactor Processes and Distillation Operations	<i>Requirements that limit emissions or operations -</i>			
				Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC 33:III.2147.D.1.	LAC 33:III.2147.C.2	--	no
				Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v	--	no
C-530	EQT080	301	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
C-532	EQT081	301	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
C-532	EQT081	301	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
E-418	EQT246	301	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM I Reactor Processes and Distillation Operations	<i>Requirements that limit emissions or operations -</i> Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC 33:III.2147.D.1.	LAC 33:III.2147.C.2	--	no
				Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v	--	no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2	--	no
E-506	need	301	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM I Reactor Processes and Distillation Operations	<i>Requirements that limit emissions or operations -</i> Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC 33:III.2147.D.1.	LAC 33:III.2147.C.2	--	no
				Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v	--	no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2	--	no

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TABLE 2: AIR POLLUTION CONTROL MEASURES

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
H-524	EQT247	301	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM I Reactor Processes and Distillation Operations	<i>Requirements that limit emissions or operations -</i> Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC 33:III.2147.D.1.	LAC 33:III.2147.C.2	--	no
				Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v	--	no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2	--	no
302	EQT0082	302	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that limit emissions or operations -</i> Non-halogenated hydrocarbons shall be burned at 1600°F for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices will be accepted provided 98% or greater VOC destruction or removal efficiency can be demonstrated. 98% is achieved with condenser E-318 and scrubber C-419 (EPN 302) operating in series.	LAC 33:III.2115.B	--	no
				<i>Requirements that specify monitoring -</i> Install and maintain monitors to accurately measure and record operation parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with the design specifications, including but not limited to the parameters listed in LAC 33:III.2115.J.2.	LAC 33:III.2115.J.2	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records as required in LAC 33:III.2115.K.	LAC 33:III.2115.K	---	no

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement			
C-113	EQT083	302	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.				LAC 33:III.2115.K.4	--	no
D-107	EQT084	302	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.				LAC 33:III.2103.I	--	no
D-111	EQT085	302	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.				LAC 33:III.2103.I	--	no
D-115	EQT086	302	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.				LAC 33:III.2103.I	--	no
D-204	EQT088	302	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.				LAC 33:III.2115.K.4	--	no
D-315	EQT087	302	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that limit emissions or operations -</i> Control of VOC by ≥ 98% DRE achieved with condenser E-318 and scrubber C-319 (EIQ 302) in series.				LAC 33:III.2115.B	--	no
E-318	need	302	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that limit emissions or operations -</i> Condenser is part of the required control scheme for D-315 (EQT087)				LAC 33:III.2115.B	--	no
303	EQT0089	303	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM I Reactor Processes and Distillation Operations	<i>Requirements that limit emissions or operations -</i> Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE>1 with the use of recovery devices (condenser/scrubber); alternative monitoring has been approved.				LAC 33:III.2147.C.2	--	yes
				<i>Requirements that specify monitoring -</i> Install, calibrate, maintain and operate monitoring device(s) to demonstrate compliance with the TRE index limit. Per letter dated April 24, 2006, LDEQ has approved alternative monitoring of minimum scrubber water flow rate which is already included as a specific requirement in the permit.				LAC 33:III.2147.E.4.a	--	yes

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
C-301	EQT248	303	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM Reactor Processes and Distillation Operations	<i>Requirements that limit emissions or operations -</i>			
				Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE>1 with the use of recovery devices (condenser/scrubber); alternative monitoring has been approved.	LAC 33:III.2147.C.2	--	no
				Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v	--	no
C-308	EQT091	303	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
C-311	EQT092	303	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
C-308	EQT091	303	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
C-313	EQT249	303	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM Reactor Processes and Distillation Operations	<i>Requirements that limit emissions or operations -</i> Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE>1 with the use of recovery devices (condenser/scrubber); alternative monitoring has been approved.	LAC 33:III.2147.C.2	--	no
				Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v	--	no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2	--	no
C-320	EQT090	303	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C322	EQT093	303	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
C-405	EQT250	303	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	<i>Requirements that limit emissions or operations -</i> Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE>1 with the use of recovery devices (condenser/scrubber); alternative monitoring has been approved.	LAC 33:III.2147.C.2	--	no
				Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v	--	no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2	--	no
E-401	EQT251	303	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	<i>Requirements that limit emissions or operations -</i> Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE>1 with the use of recovery devices (condenser/scrubber); alternative monitoring has been approved.	LAC 33:III.2147.C.2	--	no
				Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v	--	no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2	--	no

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
C-536	EQT252	304	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM Reactor Processes and Distillation Operations	<i>Requirements that limit emissions or operations -</i> Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC 33:III.2147.D.1.	LAC 33:III.2147.C.2	--	no
				Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v	--	no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2	--	no
C-551	EQT095	304	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-563	EQT096	304	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
H-545	EQT253	304	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM I Reactor Processes and Distillation Operations	<i>Requirements that limit emissions or operations -</i> Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC 33:III.2147.D.1.	LAC 33:III.2147.C.2	--	no
				Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v	--	no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2	--	no
S-560	EQT254	304	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
C-650	EQT098	306	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
D-607	EQT099	306	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
D-610	EQT100	306	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
D-612	EQT101	306	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no
D-632	EQT102	306	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	--	no

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TABLE 2: AIR POLLUTION CONTROL MEASURES

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement			
D-652	EQT103	306	LAC 33:III Chapter 21 - Waste Gas Disposal	Requirements that specify records to be kept and requirements that specify record retention time - Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.				LAC 33:III.2115.K.4	--	no
D-653	EQT104	306	LAC 33:III Chapter 21 - Waste Gas Disposal	Requirements that specify records to be kept and requirements that specify record retention time - Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.				LAC 33:III.2115.K.4	--	no
D-657	EQT105	306	LAC 33:III Chapter 21 - Waste Gas Disposal	Requirements that specify records to be kept and requirements that specify record retention time - Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.				LAC 33:III.2115.K.4	--	no
D-681	EQT137	306	LAC 33:III Chapter 21 - Waste Gas Disposal	Requirements that specify records to be kept and requirements that specify record retention time - Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.				LAC 33:III.2115.K.4	--	no
H-640	EQT256	306	LAC 33:III Chapter 21 - Waste Gas Disposal	Requirements that specify records to be kept and requirements that specify record retention time - Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.				LAC 33:III.2115.K.4	--	no
307	EQT0106	307	LAC 33:III Chaper 13 - Emission Standards for Particulate Matter; 1311.B - Allowable Rate of Emissions Based on Process Weight Rate	Requirements that limit emissions or operations -						
				Emissions of PM ₁₀ shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III Chapter 13.	LAC 33:III.1311.B	--	no			
308	EQT0107	308	LAC 33:III Chaper 13 - Emission Standards for Particulate Matter; 1311.B - Allowable Rate of Emissions Based on Process Weight Rate	Requirements that limit emissions or operations -						
				Emissions of PM ₁₀ shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III Chapter 13.	LAC 33:III.1311.B	--	no			
310	EQT0109	310	LAC 33:III Chaper 13 - Emission Standards for Particulate Matter; 1311.B - Allowable Rate of Emissions Based on Process Weight Rate	Requirements that limit emissions or operations -						
				Emissions of PM ₁₀ shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III Chapter 13.	LAC 33:III.1311.B	--	no			

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
311	EQT0110	311	LAC 33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.B - Allowable Rate of Emissions Based on Process Weight Rate	<i>Requirements that limit emissions or operations -</i>			
				Emissions of PM ₁₀ shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III Chapter 13.	LAC 33:III.1311.B	--	no
312	EQT0111	312	LAC 33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.B - Allowable Rate of Emissions Based on Process Weight Rate	<i>Requirements that limit emissions or operations -</i>			
				Emissions of PM ₁₀ shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III Chapter 13.	LAC 33:III.1311.B	--	no
313	EQT0112	313	LAC 33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.B - Allowable Rate of Emissions Based on Process Weight Rate	<i>Requirements that limit emissions or operations -</i>			
				Emissions of PM ₁₀ shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III Chapter 13.	LAC 33:III.1311.B	--	no
316	EQT0115	316	LAC 33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.B - Allowable Rate of Emissions Based on Process Weight Rate	<i>Requirements that limit emissions or operations -</i>			
				Emissions of PM ₁₀ shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III Chapter 13.	LAC 33:III.1311.B	--	no
317	EQT0116	317	LAC 33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.B - Allowable Rate of Emissions Based on Process Weight Rate	<i>Requirements that limit emissions or operations -</i>			
				Emissions of PM ₁₀ shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III Chapter 13.	LAC 33:III.1311.B	--	no

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
315A	EQT0113	315A	LAC 33:III Chapter 11 - Control of Emissions of Smoke	<i>Requirements that limit emissions or operations -</i> Emissions of smoke shall not exceed 20% average opacity for more than one six minute period in any 60 consecutive minutes.	LAC 33:III.1101.B		no
			LAC 33:III Chapter 13 - Emission Standards for Particulate Matter	<i>Requirements that limit emissions or operations -</i> Emissions of PM ₁₀ from fuel burning equipment shall not exceed 0.6 lbs per 10 ⁶ BTU of heat input.	LAC 33:III.1313.C		
315B	EQT0114	315B	LAC 33:III Chapter 11 - Control of Emissions of Smoke	<i>Requirements that limit emissions or operations -</i> Emissions of smoke shall not exceed 20% average opacity for more than one six minute period in any 60 consecutive minutes.	LAC 33:III.1101.B		no
			LAC 33:III Chapter 13 - Emission Standards for Particulate Matter	<i>Requirements that limit emissions or operations -</i> Emissions of PM ₁₀ from fuel burning equipment shall not exceed 0.6 lbs per 10 ⁶ BTU of heat input.	LAC 33:III.1313.C	--	no
F-6C	FUG0004	F-6C	LAC 33:III.Chapter 21 - Subchapter A - Fugitive Emission Control for Ozone Nonattainment Areas	<i>Requirements that limit emissions or operations -</i> All rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions shall be equipped with mechanical seals or other equivalent equipment or means as may be approved by the administrative authority	LAC 33:III.2111.A	--	no
				Comply with LAC 33:III.2122.C.	LAC 33:III.2122.C	--	no
				<i>Requirements that specify monitoring -</i> Monitor fugitive components as listed in LAC 33:III.2122.D.1.	LAC 33:III.2122.D.1	--	no
				<i>Requirements that specify monitoring -</i> Monitor fugitive components as listed in LAC 33:III.2122.D.3.	LAC 33:III.2122.D.3.	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records as required in LAC 33:III.2122.F.	LAC 33:III.2122.F	--	no
				<i>Requirements that specify reports to be submitted -</i> Submit semiannual reports by January 31 & July 31 according to LAC 33:III.2122.F.	LAC 33:III.2122.G	--	no

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
F-6D	FUG0005	F-6D	LAC 33:III.Chapter 21 - Subchapter A - Fugitive Emission Control for Ozone Nonattainment Areas	All rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions shall be equipped with mechanical seals or other equivalent equipment or means as may be approved by the administrative authority	LAC 33:III.2111.A	--	no
F-6V	FUG0001	F-6V	LAC 33:III.Chapter 21 - Subchapter A - Fugitive Emission Control for Ozone Nonattainment Areas	All rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions shall be equipped with mechanical seals or other equivalent equipment or means as may be approved by the administrative authority	LAC 33:III.2111.A	--	no
M5	EQT0125	M5	LAC 33:III.Chapter 13 - Emission Standards for Particulate Matter; 1311.B - Allowable Rate of Emissions	<i>Requirements that limit emissions or operations -</i> Emissions of PM ₁₀ shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III Chapter 13.	LAC 33:III.1311.B	--	no
WWT	GRP0014	WWT	LAC 33:III, Chapter 21, Subchapter M - Limiting VOC Emissions from	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Maintain records for exempt sources as required in LAC 33:III.2153.F.1.	LAC 33:III.2153.F.1	--	no
C-101	EQT127	2,3	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that limit emissions or operations -</i> Equip with a vapor loss control system . Vents to Unit 1 (EPN 3) or Unit 2 (EPN 2) furnaces in permit 0840-00033-V2 for control via combustion.	LAC 33:III.2103.A	--	no
				Vapor loss control system shall reduce inlet emissions of VOC by ≥95%.	LAC 33:III.2103.E	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
				<i>Requirements that limit emissions or operations -</i> Equip with submerged fill pipe.	LAC 33:III.2103.A	--	no
C-132	EQT133	2,3	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
				<i>Requirements that limit emissions or operations -</i> Equip with submerged fill pipe.	LAC 33:III.2103.A	--	no
C-136	EQT134	2,3	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i> Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
				<i>Requirements that limit emissions or operations -</i> Equip with submerged fill pipe.	LAC 33:III.2103.A	--	no

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
C-251	EQT255	2,3	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	<i>Requirements that limit emissions or operations -</i>			
				The required 90% control for the pool of non-exempt batch process vents is achieved by controlling C-251 and C-301 with >99% DRE.	LAC 33:III.2149.C.1	--	no
				Use the RACT equation specified in LAC 33:III.2149.C.1 as applicable.	LAC 33:III.2149.C.2.f	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Keep records as defined in 2149.G.1	LAC 33:III.2149.G.1	--	no
C-301	EQT135	2,3	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	<i>Requirements that limit emissions or operations -</i>			
				The required 90% control for the pool of non-exempt batch process vents is achieved by controlling C-251 and C-301 with >99% DRE.	LAC 33:III.2149.C.1	--	no
				Use the RACT equation specified in LAC 33:III.2149.C.1 as applicable.	LAC 33:III.2149.C.2.f	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Keep records as defined in 2149.G.1	LAC 33:III.2149.G.1	--	no
C-351	EQT128	2,3	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Maintain records for exempt sources as required in LAC 33:III.2149.G.1.	LAC 33:III.2149.G.1	--	no
C-352	EQT130	2,3	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that limit emissions or operations -</i>			
				Equip with submerged fill pipe.	LAC 33:III.2103.A	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
C-401	EQT129	2,3	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that limit emissions or operations -</i>			
				Equip with a vapor loss control system . Vents to Unit 1 (EPN 3) or Unit 2 (EPN 2) furnaces in permit 0840-00033-V2 for control via combustion.	LAC 33:III.2103.A	--	no
				Vapor loss control system shall reduce inlet emissions of VOC by ≥95%.	LAC 33:III.2103.E	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
C-451	EQT257	2,3	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that limit emissions or operations -</i>			
				Control of VOC by ≥ 98% DRE achieved by combustion in Unit 1 (EPN 3) or Unit 2 (EPN 2) furnaces in permit 0840-00033-V2.)	LAC 33:III.2115.B	--	no

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
C-461	EQT131	2,3	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that limit emissions or operations -</i>			
				Equip with submerged fill pipe.	LAC 33:III.2103.A	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
C-501	EQT258	2,3	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that limit emissions or operations -</i>			
				Control of VOC by $\geq 98\%$ DRE achieved by combustion in Unit 1 (EPN 3) or Unit 2 (EPN 2) furnaces in permit 0840-00033-V2.)	LAC 33:III.2115.B	--	no
C-503	EQT136	2,3	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that limit emissions or operations -</i>			
				Control of VOC by $\geq 98\%$ DRE achieved by combustion in Unit 1 (EPN 3) or Unit 2 (EPN 2) furnaces in permit 0840-00033-V2.)	LAC 33:III.2115.B	--	no
C-511	EQT259	2,3	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that limit emissions or operations -</i>			
				Control of VOC by $\geq 98\%$ DRE achieved by combustion in Unit 1 (EPN 3) or Unit 2 (EPN 2) furnaces in permit 0840-00033-V2.)	LAC 33:III.2115.B	--	no
C-521	EQT132	2,3	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that limit emissions or operations -</i>			
				Equip with submerged fill pipe.	LAC 33:III.2103.A	--	no
				<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no
C-551	EQT260	2,3	LAC 33:III Chapter 21 - Waste Gas Disposal	<i>Requirements that limit emissions or operations -</i>			
				Control of VOC by $\geq 98\%$ DRE achieved by combustion in Unit 1 (EPN 3) or Unit 2 (EPN 2) furnaces in permit 0840-00033-V2.)	LAC 33:III.2115.B	--	no
C-555	EQT261	2,3	LAC 33:III Chapter 21 - Storage of VOCs	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>			
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I	--	no

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
Facility	GRP0011		NESHAP Part 60 Subpart A - General Provisions	DOES NOT APPLY.	No Part 60 standards apply in the CathyVal Plant.	40 CFR 60
			NSPS Part 60 Subpart III - Standards of Performance for VOC Emissions From the SOCMI Air Oxidation Unit Processes	DOES NOT APPLY.	The CathyVal Plant does not produce any of the chemicals listed in 40 CFR 60.617 as products, co-products, by-products, or intermediates.	40 CFR 60.610(a)
			NSPS Part 60 Subpart NNN - Standards of Performance for VOC Emissions from SOCMI Distillation Operations	DOES NOT APPLY.	The CathyVal Plant does not produce any of the chemicals listed in 40 CFR 60.667 as products, co-products, by-products, or intermediates.	40 CFR 60.660(a)
			NSPS Part 60 Subpart RRR - Standards of Performance for VOC Emissions from SOCMI Reactor Processes	DOES NOT APPLY.	The CathyVal Plant does not produce any of the chemicals listed in 40 CFR 60.707 as products, co-products, by-products, or intermediates.	40 CFR 60.700(a)
			NSPS Part 60 Subpart YYY - Volatile Organic Compound Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Wastewater (Proposed)	DOES NOT APPLY.	The Cathy, Daphne, and Vanessa units do not produce SOCMI chemicals as primary products. Therefore, they are not affected facilities under NSPS YYY. Hydroquinone is not the primary product of the unit.	40 CFR 60.770(a)(2)(i)
			NESHAP Part 61 Subpart A - General Provisions	DOES NOT APPLY.	No Part 61 standards apply in the CathyVal Plant.	40 CFR 61.01-61.19
			NESHAP Part 61 Subpart M - National Emission Standard for Asbestos	DOES NOT APPLY.	The CathyVal Plant does not contain any asbestos.	40 CFR 61.140-61.157
			NESHAP Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations	DOES NOT APPLY.	The CathyVal Plant does not contain any benzene.	40 CFR 61.340-61.359
			NESHAP Part 63 Subpart A - General Provisions	DOES NOT APPLY.	Rhodia is not a major source of HAPs.	40 CFR 63
			NESHAP Part 63 Subpart FFFF - National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing	DOES NOT APPLY.	Rhodia is not a major source of HAPs.	40 CFR 63.2430-63.2550

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Facility	GRP0011		NESHAP Part 64 - Compliance Assurance Monitoring	DOES NOT APPLY.	No emission sources emit the major threshold amount of any pollutant.	40 CFR 64
			LAC 33:III Chapter 21, Subchapter L - Limiting Volatile Organic Compound Emissions from Cleanup Solvent Processing	DOES NOT APPLY.	Rhodia does not have any affected cleaning operations according to the definition because the plant does not use solvents with vapor pressure >1.5 psia for cleaning operations.	LAC 33:III.2151
			LAC 33:III Chapter 51 - Comprehensive Toxic Air Pollution Emission Control Program LAC 33:III.5109.A	DOES NOT APPLY.	The CathyVal plant does not emit any class I or class II TAPs for which sitewide emissions exceed the MER.	LAC 33:III.5109.A
101	EQT0009	101	LAC 33:III Chapter 21 - VOC Loading	DOES NOT APPLY.	The maximum true vapor pressure of the VOCs loaded is less than 1.5 psia.	LAC 33:III.2107
			LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM I Reactor Processes and Distillation Operations	DOES NOT APPLY.	Vanessa does not produce any products on the list of SOCM I chemicals provided in LAC 33:III.Chapter 21.Appendix A.	LAC 33:III.2147
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Vanessa is not a batch process.	LAC 33:III.2149
D-148	EQT010	101	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
D-149	EQT011	101	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
D-152	EQT012	101	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
D-153	EQT013	101	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
102	EQT0015	102	LAC 33:III Chapter 21 - VOC Loading	DOES NOT APPLY.	The maximum true vapor pressure of the VOCs loaded is less than 1.5 psia.	LAC 33:III.2107
			LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM I Reactor Processes and Distillation Operations	DOES NOT APPLY.	Vanessa does not produce any products on the list of SOCM I chemicals provided in LAC 33:III.Chapter 21.Appendix A.	LAC 33:III.2147
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Vanessa is not a batch process.	LAC 33:III.2149

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
D-107	EQT0016	102	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
			40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY.	Vapor pressure is less than 0.51 psia.	40 CFR 60.110b(b)
D-111	EQT0017	102	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
			40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY.	Capacity is less than 39,900 gallons and vapor pressure is less than 2.2 psia.	40 CFR 60.110b(b)
D-113	EQT0018	102	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
			40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY.	Capacity is less than 39,900 gallons and vapor pressure is less than 2.2 psia.	40 CFR 60.110b(b)
103	EQT0019	103	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM I Reactor Processes and Distillation Operations	DOES NOT APPLY.	Vanessa does not produce any products on the list of SOCM I chemicals provided in LAC 33:III.Chapter 21.Appendix A.	LAC 33:III.2147
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Vanessa is not a batch process.	LAC 33:III.2149
C-202	EQT019	103	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-207	EQT189	103	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-216	EQT020	103	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-217	EQT190	103	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-219	EQT191	103	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-221	EQT192	103	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-223	EQT193	103	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
C-225	EQT194	103	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-227	EQT195	103	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
104	EQT0021	104	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY.	Vanessa does not produce any products on the list of SOCMI chemicals provided in LAC 33:III.Chapter 21.Appendix A.	LAC 33:III.2147
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Vanessa is not a batch process.	LAC 33:III.2149
C-236	EQT022	104	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-240	EQT023	104	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-241	EQT196	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-243	EQT024	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-244	EQT025	104	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-245	EQT197	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-247	EQT027	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-249	EQT026	104	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-301	EQT198	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-306	EQT199	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-312	EQT200	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-314	EQT201	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-316	EQT202	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-320	EQT203	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c

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C-322X	EQT204	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
H-317	EQT205	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
106	EQT0031	106	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM I Reactor Processes and Distillation Operations	DOES NOT APPLY.	Vanessa does not produce any products on the list of SOCM I chemicals provided in LAC 33:III.Chapter 21.Appendix A.	LAC 33:III.2147
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Vanessa is not a batch process.	LAC 33:III.2149
C-434	EQT035	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-435	EQT209	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-440	EQT210	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-504	EQT211	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-507	EQT212	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-516	EQT213	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-533X	EQT214	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-558	EQT038	106	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-565	EQT215	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-568	EQT216	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-575	EQT039	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
H-520	EQT218	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c

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107	EQT0040	107	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM I Reactor Processes and Distillation Operations	DOES NOT APPLY.	Vanessa does not produce any products on the list of SOCM I chemicals provided in LAC 33:III.Chapter 21.Appendix A.	LAC 33:III.2147
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Vanessa is not a batch process.	LAC 33:III.2149
C-525	EQT219	107	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-529	EQT220	107	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-535	EQT041	107	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-545	EQT221	107	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-555A/B	EQT222	107	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-562X	EQT223	107	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-616	EQT042	107	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-648	EQT043	107	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-655	EQT044	107	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
H-556	EQT224	107	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
108	EQT0045	108	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM I Reactor Processes and Distillation Operations	DOES NOT APPLY.	Vanessa does not produce any products on the list of SOCM I chemicals provided in LAC 33:III.Chapter 21.Appendix A.	LAC 33:III.2147
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Vanessa is not a batch process.	LAC 33:III.2149
C-541	EQT046	108	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-603	EQT048	108	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-606	EQT049	108	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
C-634X	EQT225	108	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-637X	EQT226	108	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-640	EQT227	108	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-805	EQT228	108	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
H-619	EQT229	108	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
Y-620	EQT230	108	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
Y-621	EQT231	108	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
Y-640	EQT232	108	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
109	EQT0051	109	LAC33:III Chapter 13 - Emission Standards for Particulate Matter, 1311.C - Opacity Limits	Exempt	PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E
110	EQT0139	110	LAC 33:III Chapter 21 - VOC Loading	DOES NOT APPLY.	The maximum true vapor pressure of the VOCs loaded is less than 1.5 psia.	LAC 33:III.2107
			LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
111	new	111	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM I Reactor Processes and Distillation Operations	DOES NOT APPLY.	Vanessa does not produce any products on the list of SOCM I chemicals provided in LAC 33:III.Chapter 21.Appendix A.	LAC 33:III.2147
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Vanessa is not a batch process.	LAC 33:III.2149
C-407	EQT206	111	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-409	EQT029	111	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-416	EQT207	111	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
D-417	EQT030	111	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
			40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY.	Capacity is less than 39,900 gallons and vapor pressure is less than 2.2 psia.	40 CFR 60.110b(b)
201	EQT0052	201	LAC 33:III Chapter 21 - VOC Loading	DOES NOT APPLY.	The maximum true vapor pressure of the VOCs loaded is less than 1.5 psia.	LAC 33:III.2107
			LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM I Reactor Processes and Distillation Operations	DOES NOT APPLY.	Daphne does not produce any products on the list of SOCM I chemicals provided in LAC 33:III.Chapter 21.Appendix A.	LAC 33:III.2147
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Although some sections of the Daphne Unit are batch operated, there are no batch process vents routed to this scrubber.	LAC 33:III.2149
D-111	EQT053	201	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
			40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY.	Capacity is less than 39,900 gallons and vapor pressure is less than 2.2 psia.	40 CFR 60.110b(b)
D-128	EQT054	201	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
D-141	EQT055	201	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
202	EQT056	202	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM I Reactor Processes and Distillation Operations	DOES NOT APPLY.	Daphne does not produce any products on the list of SOCM I chemicals provided in LAC 33:III.Chapter 21.Appendix A.	LAC 33:III.2147
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	Exempt	No control is required for the batch process vents venting to the scrubber because the pool of non-exempt batch process vents from the Daphne unit is controlled with overall 90% efficiency utilizing other control equipment.	LAC 33:III.2149.C

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C-553	EQT058	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-561	EQT059	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-615	EQT061	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-645	EQT062	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-651	EQT063	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-655	EQT064	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-660	EQT065	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-665	EQT066	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-670	EQT067	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-675	EQT068	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-701	EQT069	202	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT.	Mass annual emission is less than 500 lb/yr.	LAC 33:III.2149.A.2.b
C-705	EQT070	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-710	EQT071	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-751	EQT072	202	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT.	Mass annual emission is less than 500 lb/yr.	LAC 33:III.2149.A.2.b
C-754	EQT236	202	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT.	Mass annual emission is less than 500 lb/yr.	LAC 33:III.2149.A.2.b
C-765	EQT073	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-770	EQT074	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-783X	EQT237	202	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT.	Mass annual emission is less than 500 lb/yr.	LAC 33:III.2149.A.2.b

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C-787	EQT238	202	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT.	Mass annual emission is less than 500 lb/yr.	LAC 33:III.2149.A.2.b
203	EQT0075	203	LAC33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.C - Opacity Limits	Exempt	PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E
301	EQT0076	301	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM Reactor Processes and Distillation Operations	DOES NOT APPLY.	If it can be demonstrated that a TRE in ex value is greater than 1.0 prior to the use of a recovery device, then such recovery device is not subject to the requirements of this Subchapter	LAC 33:III.2147.C.2
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Cathy is not a batch process.	LAC 33:III.2149
C-223	EQT077	301	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-416	EQT078	301	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-508	EQT079	301	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-530	EQT080	301	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-532	EQT081	301	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
302	EQT0082	302	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM Reactor Processes and Distillation Operations	DOES NOT APPLY.	There are no distillation or reactor vents routed to this scrubber.	LAC 33:III.2147.A
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Cathy is not a batch process.	LAC 33:III.2149
C-113	EQT083	302	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c

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D-107	EQT084	302	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
			40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY.	Vapor pressure is less than 0.51 psia.	40 CFR 60.110b(b)
D-111	EQT085	302	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
			40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY.	Vapor pressure is less than 0.51 psia.	40 CFR 60.110b(b)
D-115	EQT086	302	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
			40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY.	Vapor pressure is less than 0.51 psia.	40 CFR 60.110b(b)
D-204	EQT088	302	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
303	EQT0089	303	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Cathy is not a batch process.	LAC 33:III.2149
C-308	EQT091	303	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-311	EQT092	303	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-320	EQT090	303	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-322	EQT093	303	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c

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RHODIA, INC.
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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
304	EQT0094	304	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM Reactor Processes and Distillation Operations	DOES NOT APPLY.	If it can be demonstrated that a TRE in ex value is greater than 1.0 prior to the use of a recovery device, then such recovery device is not subject to the requirements of this Subchapter	LAC 33:III.2147.C.2
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Cathy is not a batch process.	LAC 33:III.2149
C-551	EQT095	304	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-563	EQT096	304	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
S-560	EQT254	304	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
306	EQT0097	306	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCM Reactor Processes and Distillation Operations	DOES NOT APPLY.	There are no distillation or reactor vents routed to this seal pot.	LAC 33:III.2147.A
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Cathy is not a batch process.	LAC 33:III.2149
C-650	EQT098	306	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
D-607	EQT099	306	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
D-610	EQT100	306	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
D-612	EQT101	306	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
D-632	EQT102	306	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
D-652	EQT103	306	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c

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TABLE 3: MONITORING

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
D-653	EQT104	306	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
D-657	EQT105	306	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
D-681	EQT137	306	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
H-640	EQT256	306	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
307	EQT0106	307	LAC33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.C - Opacity Limits	Exempt	PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E
308	EQT0107	308	LAC33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.C - Opacity Limits	Exempt	PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E
310	EQT0109	310	LAC33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.C - Opacity Limits	Exempt	PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E
311	EQT0110	311	LAC33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.C - Opacity Limits	Exempt	PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E
312	EQT0111	312	LAC33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.C - Opacity Limits	Exempt	PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
313	EQT0112	313	LAC33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.C - Opacity Limits	Exempt	PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E
316	EQT0115	316	LAC33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.C - Opacity Limits	Exempt	PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E
317	EQT0116	317	LAC33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.C - Opacity Limits	Exempt	PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E
315A	EQT0113	315A	LAC 33:III Chapter 15 - Emission Standards for Sulfur Dioxide	Exempt	Emissions from this unit are less than 250 tpy; therefore, Rhodia requests exemption from this requirement per LAC 33:III.1503.C.	LAC 33:III.1503.C
315B	EQT0114	315B	LAC 33:III Chapter 15 - Emission Standards for Sulfur Dioxide	Exempt	Emissions from this unit are less than 250 tpy; therefore, Rhodia requests exemption from this requirement per LAC 33:III.1503.C.	LAC 33:III.1503.C
F-6C	FUG0004	F-6C	40 CFR 60 Subpart VV - Standards of Performance for SOCM Equipment Leaks of VOC	Exempt	If an affected facility produces heavy liquid chemicals only from heavy liquid feed or raw materials, then it is exempt from §§60.482-1 through 60.482-10.	40 CFR 60.480(d)(3)
F-6D	FUG0005	F-6D	40 CFR 60 Subpart VV - Standards of Performance for SOCM Equipment Leaks of VOC	DOES NOT APPLY.	No chemicals listed in 40 CFR 60.489 are produced as intermediates or final products at the Daphne Unit.	40 CFR 60.480

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
F-6V	FUG0001	F-6V	40 CFR 60 Subpart VV - Standards of Performance for SOCM Equipment Leaks of VOC	DOES NOT APPLY.	No chemicals listed in 40 CFR 60.489 are produced as intermediates or final products at the Vanessa Unit.	40 CFR 60.480
M-5	EQT0125	M-5	LAC 33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.C - Opacity Limits	Exempt	PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E
M-6	EQT0126	M-6	LAC 33:III, Chapter 21, Subchapter M - Limiting VOC Emissions from Industrial Wastewater	Exempt	No affected VOC wastewater streams discharge to the sumps.	LAC 33:III.2153.B
WWT	GRP0014	WWT	LAC 33:III, Chapter 21, Subchapter M - Limiting VOC Emissions from Industrial Wastewater	Exempt	Any affected plant with an annual VOC loading in wastewater ≤ 10 Mg (11.03 tons) shall be exempt from the control requirements of Subsection B.	LAC 33:III.2153.G.1
C-555	EQT261	2,3	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-351	EQT128	2,3	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT.	Mass annual emission is less than 500 lb/yr.	LAC 33:III.2149.A.2.b

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Emission Point ID No.:	TEMPO ID	Description	Construction Date	Routes to: (TEMPO)	Routes to: (EPN)	Operating Rate/ Volume (gallons)	Applicable Requirements?
D-148	EQT010	Vanillin Solvent 1 Tank (MIBK)	≥1988	EQT009	101	9,120	yes
D-149	EQT011	Ethyl Vanillin Solvent 1 Tank (MIBK)	≥1988	EQT009	101	9,120	yes
D-152	EQT012	Solvent 2 Tank (MIBK)	≥1988	EQT009	101	15,400	yes
D-153	EQT013	Solvent 2 Tank (MIBK)	≥1988	EQT009	101	15,400	yes
D-169	EQT014	Solvent 3 Tank (Methanol)	≥1988	EQT009	101	11,200	yes
D-107	EQT016	Guaiacol Storage Tank	≥1988	EQT015	102	45,685	yes
D-111	EQT017	Guaiacol Storage Tank	≥1988	EQT015	102	31,725	yes
D-113	EQT018	Glyoxylic Acid Storage Tank	≥1988	EQT015	102	31,725	yes
C-202	EQT188	Premixing Reactor	≥1988	EQT019	103		yes
C-207	EQT189	Veratrole Stripper	≥1988	EQT019	103		yes
C-216	EQT020	Guaiacol Recycle Tank C-216	≥1988	EQT019	103	780	yes
C-217	EQT190	No. 1 Condensation Reactor	≥1988	EQT019	103		yes
C-219	EQT191	No. 2 Condensation Reactor	≥1988	EQT019	103	1,500	yes
C-221	EQT192	No. 3 Condensation Reactor	≥1988	EQT019	103	1,500	yes
C-223	EQT193	No. 4 Condensation Reactor	≥1988	EQT019	103	1,500	yes
C-225	EQT194	No. 5 Condensation Reactor	≥1988	EQT019	103	1,500	yes
C-227	EQT195	Polishing Reactor	≥1988	EQT019	103		yes
C-236	EQT022	Neutralization Surge Tank	≥1988	EQT021	104	1,587	yes
C-240	EQT023	Extractor Tails Upset Tank	≥1988	EQT021	104	2,570	yes
C-241	EQT196	Guaiacol Extraction Column	≥1988	EQT021	104		yes
C-243	EQT024	Extraction 1 Tails Safety Decanter	≥1988	EQT021	104	900	yes
C-244	EQT025	Mandelate Surge Tank	≥1988	EQT021	104	2,570	yes
C-245	EQT197	Solvent 1 Washing Column	≥1988	EQT021	104		yes
C-247	EQT027	Solvent 1 Washing Safety Decanter	≥1988	EQT021	104	225	yes
C-249	EQT026	Solvent 1 Surge Tank	≥1988	EQT021	104	1,600	yes
C-301	EQT198	Guaiacol Recovery Column	≥1988	EQT021	104		yes
C-306	EQT199	Guaiacol / Tars Separator	≥1988	EQT021	104		yes
C-312	EQT200	Solvent 1 Stripper Decanter	≥1988	EQT021	104		yes
C-314	EQT201	Solvent 1 Stripper	≥1988	EQT021	104		yes
C-316	EQT202	Solvent 1 Cold Trap (Vents through G-321X A/B and C-322X)	≥1988	EQT021	104		yes

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Emission Point ID No.:	TEMPO ID	Description	Construction Date	Routes to: (TEMPO)	Routes to: (EPN)	Operating Rate/ Volume (gallons)	Applicable Requirements?
C-320	EQT203	Guaiacol Distillation Reflux Drum	≥1988	EQT021	104		yes
C-322X	EQT204	Solvent 1 Vacuum Package Separator	≥1988	EQT021	104		yes
H-317	EQT205	Vacuum System	≥1988	EQT021	104		yes
C-421	EQT032	Solvent 2 Surge Tank	≥1988	EQT031	106	1,785	yes
C-429	EQT208	CO2 Separator	≥1988	EQT031	106		yes
C-430	EQT033	Solvent 2 Decanter	≥1988	EQT031	106	2,000	yes
C-432	EQT034	Extraction 2 Drain Tank	≥1988	EQT031	106	8,000	yes
C-434	EQT035	Extraction 2 Tails Safety Decanter	≥1988	EQT031	106	1,400	yes
C-435	EQT209	Vanillin Extraction Column	≥1988	EQT031	106		yes
C-440	EQT210	Solvent 2 Washing Column	≥1988	EQT031	106		yes
C-441	EQT036	Aqueous Phase Surge Tank	≥1988	EQT031	106	4,100	yes
C-501	EQT037	Solvent 2 Distillation Surge Tank	≥1988	EQT031	106	8,095	yes
C-504	EQT211	Vanillin/Solvent 2 Atmospheric Distillation Column	≥1988	EQT031	106		yes
C-507	EQT212	Vanillin/Solvent 2 Vacuum Distillation Column (Vents through E-510, C-516, G-532X and C-533X)	≥1988	EQT031	106		yes
C-516	EQT213	Solvent 2 Cold Trap (Vents through G-532X and C-533X)	≥1988	EQT031	106		yes
C-533X	EQT214	Solvent 2 Vacuum Package Separator	≥1988	EQT031	106		yes
C-558	EQT038	Aqueous Effluents Tank	≥1988	EQT031	106	2,700	yes
C-565	EQT215	Solvent 2 Recovery Column (Aqueous Phase Stripper, Vents through C-568 and E-569)	≥1988	EQT031	106		yes
C-568	EQT216	Solvent 2 Recovery Column (Top Rectification)	≥1988	EQT031	106		yes
C-575	EQT039	Solvent 2 Recovery Decanter	≥1988	EQT031	106	70	yes
E-428	EQT217	Condenser	≥1988	EQT031	106		yes
H-520	EQT218	Vacuum System	≥1988	EQT031	106		yes
C-525	EQT219	Tars Removal Column (Vents through E-527, E-528, C-555A/B, Y-564X, G-561 and C-562X)	≥1988	EQT040	107		yes
C-529	EQT220	Tars By-Pass Tank	≥1988	EQT040	107		yes
C-535	EQT041	Tars Surge Tank	≥1988	EQT040	107	2,885	yes
C-545	EQT221	Lights Removal Column (Vents through E-547, E-548, C-555A/B, Y-564X, G-561 and C-562X)	≥1988	EQT040	107		yes

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Emission Point ID No.:	TEMPO ID	Description	Construction Date	Routes to: (TEMPO)	Routes to: (EPN)	Operating Rate/ Volume (gallons)	Applicable Requirements?
C-555A/B	EQT222	Vanillin Cold Traps (Vents through Y-564X, G-561 and C-562X)	≥1988	EQT040	107		yes
C-562X	EQT223	Vanillin Purification Vacuum Package Separator	≥1988	EQT040	107		yes
C-616	EQT042	Flaker Surge Tank	≥1988	EQT040	107	3,870	yes
C-648	EQT043	Recycle Product Hopper Melter C-648	≥1988	EQT040	107	1,060	yes
C-655	EQT044	Melter Surge Tank	≥1988	EQT040	107	1,735	yes
H-556	EQT224	Vacuum System	≥1988	EQT040	107		yes
C-541	EQT046	Methanol Washing Drum (Vents through C-801)	≥1988	EQT045	108	600	yes
C-603	EQT048	Dissolver	≥1988	EQT045	108	2,300	yes
C-606	EQT049	Vacuum Crystallizer	≥1988	EQT045	108	3,710	yes
C-617	EQT050	Centrifuge Surge Tank	≥1988	EQT045	108	2,385	yes
C-634X	EQT225	Dryer Scrubber	≥1988	EQT045	108		yes
C-637X	EQT226	Crystallization Vacuum Package Separator	≥1988	EQT045	108		yes
C-640	EQT227	Dryer (Vents through C-634X)	≥1988	EQT045	108		yes
C-801	EQT047	Solvent 3 Recovery Feed Tank	≥1988	EQT045	108	6,000	yes
C-805	EQT228	Solvent 3 Recovery Column	≥1988	EQT045	108		yes
H-619	EQT229	Vacuum System	≥1988	EQT045	108		yes
Y-620	EQT230	Centrifuge A	≥1988	EQT045	108		yes
Y-621	EQT231	Centrifuge B	≥1988	EQT045	108		yes
Y-640	EQT232	Dryer	≥1988	EQT045	108		yes
C-407	EQT206	Oxidation Reactor (Vents through D-417)	≥1988	NEW	111		yes
C-409	EQT029	Mandelate Surge Tank	≥1988	NEW	111	2,575	yes
C-416	EQT207	Oxidation Column (Vents through D-417)	≥1988	NEW	111		yes
D-417	EQT030	Oxidation Surge Tank	≥1988	NEW	111	22,000	yes
D-111	EQT053	Pyrocatechol Storage Tank	≥1988	EQT052	201	27,165	yes
D-128	EQT054	Tars Storage Tank	≥1988	EQT052	201	7,050	yes
D-141	EQT055	Veratrole Storage Tank	≥1988	EQT052	201	5,825	yes
C-201	EQT057	PC Dissolution Tank	≥1988	EQT056	202	4,750	yes
C-553	EQT058	Guaiacol Distillation Feed Tank	≥1988	EQT056	202	8,000	yes
C-561	EQT059	Recycle Process Water Tank	≥1988	EQT056	202	3,100	yes
C-603	EQT060	Guaiacol Distillation Kettle (Vents through C-606)	≥1988	EQT056	202	8,800	yes

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Emission Point ID No.:	TEMPO ID	Description	Construction Date	Routes to: (TEMPO)	Routes to: (EPN)	Operating Rate/ Volume (gallons)	Applicable Requirements?
C-606	EQT233	Guaiacol Distillation Column (Vents through E-607, C-687A/B, G-682AX/BX, and C683X)	≥1988	EQT056	202		yes
C-615	EQT061	Tars Receiver	≥1988	EQT056	202	1,150	yes
C-645	EQT062	PMDB Receiver	≥1988	EQT056	202	2,500	yes
C-651	EQT063	PC Receiver	≥1988	EQT056	202	2,100	yes
C-655	EQT064	Guaiacol Lt. Ends Receiver	≥1988	EQT056	202	500	yes
C-660	EQT065	Intermediates/Veratrole Receiver	≥1988	EQT056	202	1,325	yes
C-665	EQT066	Second Receiver	≥1988	EQT056	202	750	yes
C-670	EQT067	End of Campaign Receiver	≥1988	EQT056	202	1,300	yes
C-675	EQT068	Guaiacol Receiver	≥1988	EQT056	202	5,227	yes
C-683X	EQT234	Guaiacol Vacuum Package Separator	≥1988	EQT056	202		yes
C-687A/B	EQT235	Guaiacol Distillation Cold Traps (Vents through G-682AX/BX, and C683X)	≥1988	EQT056	202		yes
C-701	EQT069	Crude Veratrole Wash Tank	≥1988	EQT056	202	1,550	yes
C-705	EQT070	Water Guaiacolate Receiver	≥1988	EQT056	202	1,325	yes
C-710	EQT071	Caustic Wash Receiver	≥1988	EQT056	202	897	yes
C-751	EQT072	Veratrole Distillation Kettle (Vents through C-754, E-760, C-787, G782AX/BX, and C-783X)	≥1988	EQT056	202	980	yes
C-754	EQT236	Veratrole Distillation Column (Vents through E-760, C-787, G782AX/BX, and C-783X)	≥1988	EQT056	202	450	yes
C-765	EQT073	Lt. Ends Receiver	≥1988	EQT056	202	110	yes
C-770	EQT074	Distilled Veratrole Receiver	≥1988	EQT056	202	800	yes
C-783X	EQT237	Veratrole Vacuum Separator	≥1988	EQT056	202		yes
C-787	EQT238	Veratrole Distillation Cold Traps (Vents through G782AX/BX, and C-783X)	≥1988	EQT056	202		yes
C-213	EQT239	First Reactor	≥1989	EQT076	301		yes
C-215	EQT240	Second Reactor (vents indirectly via 1st reactor)	≥1989	EQT076	301		yes
C-217	EQT241	Third Reactor (vents indirectly via 1st reactor)	≥1989	EQT076	301		yes
C-219	EQT242	Fourth Reactor (vents indirectly via 1st reactor)	≥1989	EQT076	301		yes
C-223	EQT077	Phenol Drain Tank Reaction Surge Drum	≥1989	EQT076	301	765	yes
C-231	EQT243	Fifth Reactor (vents indirectly via 1st reactor)	2001	EQT076	301		yes

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C-416	EQT078	Predephenol Reflux Drum	≥1989	EQT076	301	2,937	yes
C-501	EQT244	Detarring Column, vents via H-524	≥1989	EQT076	301		yes
C-508	EQT079	Vertical Tar Diluter	≥1989	EQT076	301	264	yes
C-521	EQT245	Final Dephenoling Column, vents via H-524	≥1989	EQT076	301		yes
C-530	EQT080	Distillation Drain Tank	≥1989	EQT076	301	761	yes
C-532	EQT081	Tails Surge Drum	≥1989	EQT076	301	4,635	yes
E-418	EQT246	Phenol Condenser	≥1989	EQT076	301		yes
E-506	need	Detarring Condenser	≥1989	EQT076	301		yes
H-524	EQT247	Vacuum System	≥1989	EQT076	301	<100	yes
C-113	EQT083	Phenol Unloading Tank	≥1989	EQT082	302	1,000	yes
D-107	EQT084	Washwater Tank	≥1989	EQT082	302	88,900	yes
D-111	EQT085	Phenol Make-Up Tank	≥1989	EQT082	302	66,100	yes
D-115	EQT086	Washwater Tank	≥1989	EQT082	302	42,300	yes
D-204	EQT088	Recycle Phenol Tank	≥1989	EQT082	302	18,500	yes
D-315	EQT087	Raffinate Tank	≥1989	EQT082	302	58,000	yes
E-318	need	Predephenoling Vent Condenser	≥1989	EQT082	302		yes
C-301	EQT248	Water Stripper, vents via E-401	≥1989	EQT089	303		yes
C-308	EQT091	IPE Settler	≥1989	EQT089	303	6,780	yes
C-311	EQT092	Wash Water Drum	≥1989	EQT089	303	6,822	yes
C-313	EQT249	Extraction Column, vents via E-401	≥1989	EQT089	303		yes
C-320	EQT090	IPE Storage Tank	≥1989	EQT089	303	23,978	yes
C-322	EQT093	Ether Drain Tank	≥1989	EQT089	303	673	yes
C-405	EQT250	Dehydration Column, vents via E-408 and E-401	≥1989	EQT089	303		yes
E-401	EQT251	Solvent Vent Condenser	≥1989	EQT089	303		yes
C-536	EQT252	Splitter Column (PC/HQ Separation), vents via H-545	≥1989	EQT094	304		yes
C-551	EQT095	PC Receiving Drum	≥1989	EQT094	304	500	yes
C-563	EQT096	PC Flaker Feed Tank	≥1989	EQT094	304	500	yes
H-545	EQT253	Vacuum System	≥1989	EQT094	304		yes
S-560	EQT254	PC Flaker (Intermittent, for S/D only)	≥1989	EQT094	304		yes
C-650	EQT098	Reflux Surge Drum C-650	≥1989	EQT097	306	350	yes

CATHYVAL PLANT - BATON ROUGE FACILITY
RHODIA, INC.
BATON ROUGE, EAST BATON ROUGE PARISH, LOUISIANA

TABLE 4: RECORDKEEPING

Enter each single emission point that routes its emissions to another source (i.e., a control device) or a common stack, or is part of an Emissions Cap. List the emissions source to which each single emission point is routed or the Cap of which the source is a member, if applicable. Consult instructions.

Emission Point ID No.:	TEMPO ID	Description	Construction Date	Routes to: (TEMPO)	Routes to: (EPN)	Operating Rate/ Volume (gallons)	Applicable Requirements?
D-607	EQT099	HQ Dissolver Tank D-607	≥1989	EQT097	306	1,375	yes
D-610	EQT100	HQ Surge Tank D-610	≥1989	EQT097	306	7,000	yes
D-612	EQT101	Carbon Treater Tank D-612	≥1989	EQT097	306	700	yes
D-632	EQT102	Crystallization Tank D-632	≥1989	EQT097	306	1,763	yes
D-652	EQT103	Mother Liquor Surge Tank D-652	≥1989	EQT097	306	8,068	yes
D-653	EQT104	Conc. Column Feed Tank D-653	≥1989	EQT097	306	6,792	yes
D-657	EQT105	Mother Liquor Surge Drum D-657	≥1989	EQT097	306	85	yes
D-681	EQT137	Screener Residue Dissolver	≥1989	EQT097	306	212	yes
H-640	EQT256	Vacuum System for Crystallizers	≥1989	EQT097	306		yes
D-197	EQT120	Tank D-197	≥1988	GRP0014	WWT	50,000	no
D-210	EQT121	West Aeration Basin	≥1988	GRP0014	WWT	1,530,000	no
D-213	EQT122	East Aeration Basin	≥1988	GRP0014	WWT	1,530,000	no
D-280	EQT118	Tank 28	≥1988	GRP0014	WWT	600,000	no
D-290	EQT119	Tank 29	≥1988	GRP0014	WWT	1,500,000	no
D-301	EQT123	West Clarifier	≥1988	GRP0014	WWT	296,200	no
D-304	EQT124	East Clarifier	≥1988	GRP0014	WWT	296,200	no
C-101	EQT127	IPE Solvent Storage Tank	≥1988	GRP002*	2, 3	8,840	yes
C-132	EQT133	MeCl Storage Tank	≥1988	GRP002*	2, 3	14,340	yes
C-136	EQT134	EtCl Storage Tank	≥1988	GRP002*	2, 3	15,400	yes
C-251	EQT255	Batch Reactor	≥1988	GRP002*	2, 3		yes
C-301	EQT135	Acidification/Decantation Tank	≥1988	GRP002*	2, 3	8,000	yes
C-351	EQT128	RAG Layer Diverting Tank	≥1988	GRP002*	2, 3	3,430	yes
C-352	EQT130	RAG Layer Surge Tank	≥1988	GRP002*	2, 3	1,500	yes
C-401	EQT129	Aqueous Phase Surge Tank	≥1988	GRP002*	2, 3	6,162	yes
C-451	EQT257	Extraction Column	≥1988	GRP002*	2, 3		yes
C-461	EQT131	Aqueous Effluents Tank	≥1988	GRP002*	2, 3	715	yes
C-501	EQT258	Deetheration Column (Vents through C-503)	≥1988	GRP002*	2, 3		yes
C-503	EQT136	Deetheration IPE Decanter	≥1988	GRP002*	2, 3	208	yes
C-511	EQT259	Deetheration Guaiacol Decanter (Vents through C-501)	≥1988	GRP002*	2, 3		yes
C-521	EQT132	Organic Phase Surge Tank	≥1988	GRP002*	2, 3	7,070	yes

**CATHYVAL PLANT - BATON ROUGE FACILITY
RHODIA, INC.
BATON ROUGE, EAST BATON ROUGE PARISH, LOUISIANA**

TABLE 4: RECORDKEEPING

Enter each single emission point that routes its emissions to another source (i.e., a control device) or a common stack, or is part of an Emissions Cap. List the emissions source to which each single emission point is routed or the Cap of which the source is a member, if applicable. Consult instructions.

Emission Point ID No.:	TEMPO ID	Description	Construction Date	Routes to: (TEMPO)	Routes to: (EPN)	Operating Rate/ Volume (gallons)	Applicable Requirements?
C-551	EQT260	Crude Guaiacol Dehydration Column (Vents through C-501)	≥1988	GRP002*	2, 3		yes
C-555	EQT261	Wet Guaiacol Tank (Vents through C-501)	≥1988	GRP002*	2, 3	425	yes

*GRP002 is located in permit 0840-00033-V2 for Rhodia's Sulfuric Acid Plant. It represents the Unit No. 1 and Unit No. 2 Sulfuric Acid Regeneration Furnaces.

SECTION 5.0

**EMISSION INVENTORY QUESTIONNAIRE
FOR AIR POLLUTANTS**

5-1

5-2

5-3

5-5

5-6

[illegible]

5-8

5-9

5-10

*Data are preliminary, will be finalized after stack test which is scheduled for late Feb 2010.

5-14

015-007-001NG-App

5-17

5-20

5-21

5-22

5-23

015-007-001NG-App

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015-007-001NG-App

5-32

5-33

5-34

5-35

SECTION 6.0
EMISSION CALCULATIONS

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Vanessa
EIQ I.D.: 101
Description: Lights Tank Farm Scrubber C-165

Sources Venting to Scrubber

MIBK and methanol storage tanks, estimate using Tanks Program
 Loading of Vanessa tars into trucks, estimate using AP-42 Loading Loss equation

Tanks Program Inputs:	D-148	D-149	D-152	D-153	D-169
contents	MIBK	MIBK	MIBK	MIBK	methanol
Type of Tank	vertical	vertical	horizontal	horizontal	vertical
shell height/length (ft)	12	12	24	24	15
shell diameter (ft)	10.5	10.5	10	10	10.5
maximum liquid height (ft)	11.75	11.75			14.75
average liquid height (ft)	6.0	6.0			7.0
Volume (gals)	8,200	8,200	14,600	14,600	10,350
Turnovers per year	675.61	675.61	660.96	660.96	490.82
Net Throughput (gals/yr) ¹	5,540,000	5,540,000	9,650,000	9,650,000	5,080,000
Is Tank Heated?	N ²	N ²	N ²	N ²	N
roof color/shade	aluminum/specular	aluminum/specular			aluminum/specular
roof condition	good	good			good
roof type (cone or dome)	dome	dome			dome
height of cone/dome	1.42	1.42			1.5
slope of cone roof (ft/ft) or radius (ft) of dome roof	10.5	10.5			10.5
shell color/shade	aluminum/specular	aluminum/specular	aluminum/specular	aluminum/specular	aluminum/specular
shell condition	good	good	good	good	good
vacuum settings (psig) ³	-0.5	-0.5	-0.5	-0.5	-0.5
pressure settings (psig) ³	0.5	0.5	0.5	0.5	0.5
Tanks Program Outputs:					
Annual Emissions, pre-scrubber, lbs/yr	909.06	909.06	1590.86	1590.86	1974.16

¹ The annual throughput of Tanks 148 and 149 is capped at 11,080,000 gal/yr and the annual throughput of Tanks 152 and 153 is capped at 19,300,000 gal/yr. The annual throughput listed here for each tank is an average used to calculate permitted emission rates and is not intended to set a permit limit on the annual throughput of each tank. Since the tanks are identical, emissions will be the same regardless of which tank is used.

² Material entering tank is at elevated temperature, however tank is equipped with a cooler. Temperature ranges from 45-95 °F with typical summer high about 85 °F. Emissions are expected to be less than if the tank operated at ambient temperature with no cooler. Thus, ambient will be assumed for the Tanks program.

³ Actual difference between pressure and vacuum vent settings is >1 psig, max pressure difference allowed by Tanks is 1 psig (0.5 psig for each).

Loading Emissions - Pre-Scrubber

	Vanessa tars
Temperature of bulk liquid loaded, F	185
Temperature of bulk liquid loaded, R	645
Temperature of bulk liquid loaded, K	614
P (psia), vapor pressure, assume guaiacol properties ⁹	0.2159
M, molecular weight	124.14
S, saturation factor ⁷	1.45
L _L , loading loss, lbs per 1000 gals loaded ⁸	0.751
Annual Amount Loaded, gals	250,000
Annual Pre-controlled Emissions, lbs/yr	187.7

⁷Choices are:

<i>submerged fill, clean container</i>	0.50
<i>submerged fill, dedicated service</i>	0.60
<i>submerged fill, vapor balance</i>	1.00
<i>splash, clean or dedicated</i>	1.45
<i>splash, vapor balance</i>	1.00

⁸Per AP-42, Section 5-2, *Transportation and Marketing of Petroleum Liquids*, 1/95, Equation 1, $L_L = 12.46 \text{ SPM/T}$ (T in degrees R, P in psia)

⁹ The truck used to transport Vanessa tars is also used to transport Daphne tars and may contain phenol and/or pyrocatechol in the vapor space. Similarly, when emissions from loading Daphne tars are vented to scrubber C-146, the vapors may contain MIBK from a previous load of Vanessa tars. When the emissions from the two scrubbers are considered in aggregate, the net effect is negligible and is thus not addressed in the emission calculations.

Estimate Emissions During Plant Outage with no Scrubber Water Flow (Breathing Losses from Vessels)

Duration: 10 Days

Tank	contents	Highest Monthly Breathing Loss (lbs/mo) ¹¹	Outage Breathing Loss (lbs)
D-148	MIBK	1.27	0.42
D-149	MIBK	1.27	0.42
D-152	MIBK	2.7	0.90
D-153	MIBK	2.7	0.90
D-169	MeOH	14.14	4.71

¹¹Per Tanks 4.0 program, same inputs as above, June is worst month for breathing losses.

TOTAL EMISSIONS

	Pre-Control Emissions		Control Efficiency	Outage lbs/yr	Emissions for EIQ Form	
	Storage Tanks lbs/yr	Loading lbs/yr			Average lbs/hr	Annual TPY
MIBK	4999.840		93.8%	2.65	0.036	0.156
methanol	1974.160		99.9%	4.71	0.001	0.003
guaiacol		187.684	99.0%			0.001
total VOCs					0.037	0.161

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Vanessa
EQ I.D.: 102
Description: Heavies Tank Farm Scrubber C-187

Sources Venting to Scrubber

guaiacol storage tank, D-107
 guetol storage tank, D-111
 glyoxylic acid (50% aqueous) storage tank, D-113, negligible emissions
 guaiacol loading
 guetol loading
 PMP loading

Tanks Program Inputs:	D-107	D-111
contents	guaiacol	guetol
Type of Tank	vertical	vertical
shell height/length (ft)	24	24
shell diameter (ft)	18	15
maximum liquid height (ft)	24	24
average liquid height (ft)	12	12
Volume (gals)	45,000	31,700
Turnovers per year	37.24	49.65
Net Throughput (gals/yr)	1,676,000	1,574,000
Is Tank Heated?	Y ²	Y ²
For heated tanks, avg liquid surface temp	180	190
For heated tanks, min liquid surface temp	180	190
For heated tanks, max liquid surface temp	180	190
For heated tanks, bulk liquid surface temp	180	190
roof color/shade	aluminum/specular	aluminum/specular
roof condition	good	good
roof type (cone or dome)	cone	cone
height of cone/dome	0	0
slope of cone roof (ft/ft) or radius (ft) of dome roof	0.27	0.27
shell color/shade	aluminum/specular	aluminum/specular
shell condition	good	good
vacuum settings (psig) ³	0.000	0.000
pressure settings (psig) ³	0.000	0.000
Tanks Program Outputs:		
Annual Emissions, pre-scrubber, lbs/yr	902.38	701.59

² For tanks heated above 100F, the vapor pressure at the elevated temperature was entered for Option 1. Per Tanks program manual, the program will select this value for temps over 100F as long as Option 2 is blank.

³ Req'd to be zero for constant temperature tanks.

Loading Emissions - Pre-Scrubber

	Guaiacol	Guetol	PMP
Temperature of bulk liquid loaded, F	110	120	225
Temperature of bulk liquid loaded, R	570	580	685
Temperature of bulk liquid loaded, K	316	322	380
P (psia), vapor pressure	0.018	0.023	0.098
M, molecular weight	124.14	138.17	124.14
S, saturation factor ⁷	0.5	0.5	0.5
L _L , loading loss, lbs per 1000 gals loaded ⁸	0.025	0.034	0.110
Annual Amount Loaded, gals	400,000	300,000	77,000
Annual Pre-controlled Emissions, lbs/yr	9.95	10.24	8.48

⁷Choices are:

<i>submerged fill, clean container</i>	0.50
<i>submerged fill, dedicated service</i>	0.60
<i>submerged fill, vapor balance</i>	1.00
<i>splash, clean or dedicated</i>	1.45
<i>splash, vapor balance</i>	1.00

⁸Per AP-42, Section 5-2, *Transportation and Marketing of Petroleum Liquids*, 1/95,
Equation 1, $L_L = 12.46 \text{ SPM/T (T in degrees R, P in psia)}$

TOTAL EMISSIONS

	Pre-Control Emissions		Control Efficiency	Emissions for EIQ Form	
	Storage Tanks lbs/yr	Loading lbs/yr		Average lbs/hr	Annual TPY
guaiacol	902.380	9.955	99.20%		0.004
guetol	701.590	10.245	99.20%		0.003
PMP		8.48	99.20%		0.000
total VOCs				0.001	0.007

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Vanessa
EIQ I.D.: 103
Description: Condensation Vent Scrubber C-201

Pollutant	Removal Efficiency ¹ (%)	Feed to Scrubber ¹ (lbs/hr)	Average Hourly Emissions (lbs/hr)	Maximum Hourly Emissions ² (lbs/hr)	Annual Emissions (tpy)
Guaiacol	99.7%	0.636	0.002	0.004	0.008
Veratrole	98.1%	0.456	0.009	0.017	0.038
Total VOC			0.011	0.021	0.046

¹ Cathyval Project Vanessa Vent Scrubbers Design Summary, 5/23/89, added 20% safety factor.

² Maximum assumed to be twice the average.

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Vanessa
EIQ I.D.: 104
Description: Solvent 1 Vent Scrubber C-248

Pollutant	Removal Efficiency (%)	Average Feed to Scrubber ¹ (lbs/hr)	Maximum Feed to Scrubber ¹ (lbs/hr)	Average Hourly Emissions (lbs/hr)	Maximum Hourly Emissions (lbs/hr)	Annual Emissions (tpy)
MIBK	98.7%	2.10	2.10	0.027	0.027	0.120
other VOC	99.9%	0.005	2.56	0.000	0.003	0.000
Total VOC				0.027	0.030	0.120

¹ Cathyval Project Vanessa Vent Scrubbers Design Summary, 5/23/89, added 20% safety factor.

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Vanessa
EQ I.D.: 106
Description: Vanillin Extraction Scrubber C-427

Pollutant	Removal Efficiency ² (%)	Average Hourly Emissions ¹ (lbs/hr)	Maximum Hourly Emissions ³ (lbs/hr)	Annual Emissions (tpy)
MIBK	98.0%	0.21	0.82	0.90
Total VOC		0.21	0.82	0.90

¹ Based on testing conducted July 2007 to determine emissions impact of VMAX project.
Used 5 times the max test result as conservative estimate.

² There is a condenser upstream of this scrubber. This represents efficiency of condenser
and scrubber in series.

³ Conservatively assumed to be four times the average.

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathayal Plant

Unit: Vanessa
EIQ I.D.: 107
Description: Distillation Scrubber C-557

Pollutant	Removal Efficiency (%)	Average Hourly Emissions ¹ (lbs/hr)	Maximum Hourly Emissions ² (lbs/hr)	Maximum Hourly Duration ³ (hrs/yr)	Annual Emissions (tpy)
MIBK	99.2%	<0.001	0.100	150	0.01
Total VOC	99.9%	<0.001	0.100		0.01

¹ Stack test conducted by Weston on 11-20-2008.

² Intermittant line-clearing operations.

³ Assumes maximum occurs for 150 hours per year.

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Vanessa
EQ I.D.: 108
Description: Crystallization Scrubber C-624

Pollutant	Removal Efficiency (%)	Average Feed to Scrubber ¹ (lbs/hr)	Average Hourly Emissions (lbs/hr)	Maximum Hourly Emissions (lbs/hr)	Annual Emissions (tpy)
Methanol	99.9%	1.806876	0.002	0.002	0.008
other VOC	99.8%	0.0024	0.000	0.000	0.000
Total VOC			0.002	0.002	0.008

¹ Cathyval Project Vanessa Vent Scrubbers Design Summary, 5/23/89, added 20% safety factor.

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Vanessa
EQ I.D.: 109
Description: Baghouse Filter Scrubber C-704

Operating Time = 8760 hrs/yr
 Gas flow = 7400 ACFM
 Particulate conc (inlet) = 10 ppm
 Molecular weight of air = 29
 Molar volume at 77F (avg temp) = 392 ft³/lbmole
 Removal Efficiency = 95%
 Emissions (outlet) = 0.0164 lbs/hr

	Average Hourly Emissions (lbs/hr)	Maximum Hourly Emissions (lbs/hr)	Annual Emissions (tpy)
PM10	0.02	0.03	0.07

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Cathy
EIQ I.D.: 110
Description: High Purity PC Mixing Vessel

Basis/Steps

1. Solvent (DMSO) arrives in a trailer and is unloaded into the mixing vessel. There are no emissions from this step because pressure is allowed to build in the mixing vessel and associated piping to accomodate the volume of solvent. This has been verified in actual operation (the pressure control valve does not open.)
2. Molten PC at 300 F is then slowly added to the mixing vessel. The mixing vessel is equipped with an agitator and external cooling to keep the temperature at or below 130 F. The pressure control vent does open and vent to atmosphere during the mixing step. Time for mixing is one hour or less.
3. After mixing, the PC/solvent mixture is transferred into trailers for offsite shipment. Three batches will be made to load each trailer. Mixture loading will vent to atmosphere. Loading is complete in one hour or less. Temperature has cooled to 100 F or less before loading.
4. Fugitive emissions were calculated to be 0.0001 TPY which is negligible in this case.

Operating Hours (used only for calculating average emissions, not annual or max)

Hours per Day	6
Days Per Week	1.1
Weeks Per Year	52

Input Data

Total mixture shipped	1000 MT/year
Total mixture per batch	6 MT
Batches per trailer	3
Trailers per year	56
Mixing vessel volume	1900 gals
Amount of PC added per batch	350 gals
Amount of DMSO added per batch	1400 gals
Initial temperature in vessel prior to adding PC	80 F
Max temperature of mixture	130 F
Pressure control vent setting, Pcv	20 psig
Loading rate into trailers (approx)	150 gpm
Loading temperature	100 F
Saturation factor, loading mixture into trailers ¹	0.6

¹ Choices are:

<i>submerged fill, clean container</i>	<i>0.50</i>
<i>submerged fill, dedicated service</i>	<i>0.60</i>
<i>submerged fill, vapor balance</i>	<i>1.00</i>
<i>splash, clean or dedicated</i>	<i>1.45</i>
<i>splash, vapor balance</i>	<i>1.00</i>

Emissions from mixing step

Emissions occur due to vapor displacement from adding PC to the mixing vessel and due to vapor expansion from heat of mixing. Although these operations occur simultaneously, they will be treated separately in the emission calculation for simplicity.

Vapor displacement per batch from adding PC	350 gals
(assume equal to amount of PC added)	46.79 ft ³ @ Pcv
Volume of vapor space at initial temp (all inside vessel)	500 gals
	66.8 ft ³ @ Pcv
Volume of vapor at final temp (inside+outside vessel)	73.0 ft ³ @ Pcv
Volume displaced from temp increase	6.2 ft ³ @ Pcv
Total volume displaced (PC addition + temp increase)	52.98 ft ³ @ Pcv
Molar volume at final temp and Pcv (from ideal gas law)	183 ft ³ /lbmole
Total moles displaced	0.29029 lbmoles
Pvap of DMSO @ final temp ²	0.00537 bar
	0.00530 atm
Ptotal (Pcv)	2.36054 atm
Vapor mole fraction of DMSO	0.00224
DMSO displaced per batch	0.00065 lbmoles
	0.05091 lbs
PC per batch	0.00069 lbs
(assuming ratio of PC to DMSO from physical property spreadsheet)	

² From physical property spreadsheet by Marc LeGros.

Loading into trailers

Estimate emissions using AP-42 for loading.

AP-42 loading loss equation:

$$L_L = 12.46 SP_{vap}M/T$$

Where:

"S" is the saturation factor

"P_{vap}" is the true vapor pressure of liquid loaded, psia

"M" is the molecular weight of vapors

"T" is the temperature of the bulk liquid loaded, R

"L_L" is the loading emissions, lbs per 1000 gal liquid loaded

To be conservative, use DMSO vapor pressure to represent mixture vapor pressure

S =	0.6
P _{vap} (bars)	0.00218
P _{vap} (psia)	0.032
M	78.135
L _L	0.033
1000 Gallons loaded per batch =	1.75
Total emissions per batch =	0.058 lbs
PC emissions per batch =	0.001 lbs
(assume max of 2% PC based on process spreadsheet)	

Total Emissions

	avg lbs/hr	max lbs/hr ³	TPY
PC	0.001	0.001	0.0002
total VOC	0.054	0.058	0.009

³ Max emissions occur during loading

Discharge Characteristics

Discharge Diameter	1 0.083	inches feet
Discharge Area	0.005	ft ²
Stack Gas Flowrate	150	gpm
(assume loading gives max stack flow)	20.1	acfm
Stack Gas Velocity	61.3	ft/sec

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Vanessa
EQ I.D.: 111
Description: Oxidation Vent

Pollutant	Average Hourly Emissions ¹ (lbs/hr)	Maximum Hourly Emissions ¹ (lbs/hr)	Annual Emissions ¹ (tpy)
MIBK	<0.001	<0.001	0.002
Methanol	0.001	0.001	0.006
Total VOC	0.018	0.018	0.079

¹ As preliminary estimate, assume same as C-419 currently permitted emissions. Will be updated when stack test is complete.

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Daphne
EIQ I.D.: 201
Description: Tank Farm Scrubber C-146

Sources that Vent to Scrubber:

PC storage tank, D-111
 Veratrol storage tank, D-141
 Cathy Tars storage tank, D-128 (assume 100% HQ for emission calcs)
 Veratrole loading
 PC loading
 PDMB Loading
 Daphne tars loading

Tanks Program Inputs:	D-111	D-141	D-128
contents	PC	veratrole	Cathy tars
Type of Tank	vertical	vertical	vertical
shell height/length (ft)	16	10	12
shell diameter (ft)	17.0	10	10
maximum liquid height (ft)	15	9	11
average liquid height (ft)	8	5	6
Volume (gals)	25,000	4,950	7,050
Turnovers per year	69.52	42.02	141.84
Net Throughput (gals/yr)	1,738,000	208,000	1,000,000
Is Tank Heated?	Y ⁴	Y ⁴	Y ⁴
For heated tanks, avg liquid surface temp	300	195	230
For heated tanks, min liquid surface temp	300	195	230
For heated tanks, max liquid surface temp	300	195	230
For heated tanks, bulk liquid surface temp	300	195	230
roof color/shade	aluminum/specular	aluminum/specular	aluminum/specular
roof condition	good	good	good
roof type (cone or dome)	cone	cone	cone
height of cone/dome	0	0	0
slope of cone roof (ft/ft) or radius (ft) of dome roof	0.34	0.21	0.17
shell color/shade	aluminum/specular	aluminum/specular	aluminum/specular
shell condition	good	good	good
vacuum settings (psig) ³	0.000	0.000	0.000
pressure settings (psig) ³	0.000	0.000	0.000
Tanks Program Outputs:			
Annual Emissions, pre-scrubber, lbs/yr	1408.51	137.95	13.7

³ Pressure/vacuum vent settings must be set to 0 for heated tanks.

⁴ For tanks heated above 100F, the vapor pressure at the elevated temperature was entered for Option 1.
 Per Tanks program manual, the program will select this value for temps over 100F as long as Option 2 is blank.

Loading - Pre-controlled Emissions

	PC	Veratrole	PDMB	Daphne tars (PC) ³
Temperature of bulk liquid loaded, F	275	170	180	320
Temperature of bulk liquid loaded, R	735	630	640	780
Temperature of bulk liquid loaded, K	408	350	355	433
P (psia), vapor pressure	0.401	0.115	0.107	4.25
M, molecular weight	110.11	138.17	138.17	124.139
S, saturation factor ⁴	1.45	1.45	0.5	1.45
L _L , loading loss, lbs per 1000 gals loaded ⁵	1.086	0.458	0.144	12.226
Annual Amount Loaded, gals	186,000	190,000	25,000	103,000
Annual Pre-controlled Emissions, lbs/yr	202.1	86.9	3.6	1259.3

³ As conservative estimate, use properities of guaiacol (higher Pvap) to calculate emissions, then assume the emissions are PC (b/c PC is a HAP).

⁴ Choices are:

<i>submerged fill, clean container</i>	<i>0.50</i>
<i>submerged fill, dedicated service</i>	<i>0.60</i>
<i>submerged fill, vapor balance</i>	<i>1.00</i>
<i>splash, clean or dedicated</i>	<i>1.45</i>
<i>splash, vapor balance</i>	<i>1.00</i>

⁵ Per AP-42, Section 5-2, *Transportation and Marketing of Petroleum Liquids*, 1/95, Equation 1, L_L = 12.46 SPM/T (T in degrees R, P in psia)

TOTAL EMISSIONS

	Pre-Control Emissions		Control Efficiency	Emissions for EIQ Form	
	Storage Tanks lbs/yr	Loading lbs/yr		Average lbs/hr	Annual TPY
PC	1408.510	1461.320	98.0%	0.007	0.029
HQ	13.700		98.0%	0.000	0.000
other VOCs	137.950	90.528	98.0%		0.002
total VOCs				0.007	0.031

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Daphne
EIQ I.D.: 202
Description: Vent Scrubber C-685

Pollutant	Removal Efficiency (%)	Average Hourly Emissions (lbs/hr)	Maximum Hourly Emissions (lbs/hr)	Annual Emissions (tpy)	Basis
Pyrocatechol	>98	0.005	0.048	0.02	1
Hydroquinone	>98	0.001	0.055	0.003	1
Methanol	>98	0.001	0.005	0.003	1
Phenol	>98	0.000	0.001	0.000	1
Total VOC ²	>98	0.156	1.116	0.78	1

¹ Add 20% safety factor to C. Bertrand calculations done for 1996 permit mod.

² Does not equal sum of species listed due to presence of nonTAP VOCs.

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Cathy
EIQ I.D.: 301
Description: Phenolic Reactors Vent Scrubber C-209 (P&I.D. F201)

Pollutant	Removal Efficiency (%)	Normal Operation1		Hot Water Flush2		Outage3	Overall Emissions		
		Emissions (lbs/hr)	Hrs/Yr	Emissions (lbs/hr)	Hrs/Yr		Average Hourly Emissions (lbs/hr)	Maximum Hourly Emissions (lbs/hr)	Annual Emissions (tpy)
Phenol	≥98	4.63E-05	8744	21	16	0.556	0.04	21	0.17
Pyrocatechol	≥99.9	4.63E-04	8744	2.7	16		0.01	2.7	0.024
Hydroquinone	≥53	6.53E-05	8744	0.3	16		0.001	0.30	0.003
Total VOC							0.04	24.0	0.19

Notes:

- 1 Based on stack testing conducted by ESE, June 1995. The maximum of the three test runs was used.
- 2 Uncontrolled emissions per design calcs
- 3 Scrubber Water Shut Off During Plant Outage:, nitrogen sweep shut off:

Basis: Upon
shutdown and
nitrogen sweep

Number of total heat-ups per year, (5 vessels, 10X each)	50
Temp increase per event	10 F
Phenol MW	94.113
Phenol freezing point	105.6 F
Assumed tank temp prior to heating	115.6 F
	575.6 R
	319.6 K
Vapor Pressure of Phenol at assumed temp	0.040 psia
Total pressure	14.7 psia
	1.00 atm
Mole fraction phenol, yi	0.00272
Vapor Space Volume	8000 gals
Universal Gas Constant,R	0.7302 atm·ft ³ /lbmole·R
Total moles in vapor space prior to heating	2.5446 lbmoles
Total moles phenol in vapor space prior to heating	0.0069 lbmoles
Vapor Expansion Factor	1.017
Phenol emitted per heat-up event	1.18E-04 lbmoles
	0.011 lbs
Total Emissions (assume all phenol)	0.556 lbs

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Cathy
EQ I.D.: 302
Description: OSBL Tank Farm Scrubber C-319 (P&I.D. F107)

	Removal Efficiency (%)	Normal Operation ⁴			Hot Water Flush		Outage ⁵		Overall Emissions		
		Emissions (lbs/hr)	Basis	hrs/yr	Emissions (lbs/hr) ³	Hrs/Yr	Emissions (lbs/hr)	hrs/yr	Average Hourly Emissions (lbs/hr)	Maximum Hourly Emissions (lbs/hr)	Annual Emissions (tpy)
Phenol	≥98	3.17E-05	1	8744	2.54	16			0.005	2.54	0.02
Isopropyl Ether	≥98	0.022	2	8504	13.5	16	0.97	240	0.073	13.50	0.32
Total VOC									0.077	16.04	0.34

Notes:

¹ Based on stack testing conducted by ESE, June 1995. The maximum of the three test runs was used.

² Based on stack testing conducted by G&M, Dec. 1996. The average emission rate is during R/C loading at normal scrubber flow rate.

³ Per design calcs Apx B, this is rate exiting condenser (normal inlet to scrubber).

⁴ This scenario also includes a planned plant outage where nitrogen sweep is off, condenser is off, and scrubber is on. These emissions are less than normal as estimated below.

⁵ This scenario is a planned plant outage where nitrogen sweep is off, condenser is off, and scrubber is off. These emissions are greater than normal (as estimated below) and must be included in annual limit.

Calculate Breathing Losses During Plant Outage with Nitrogen Sweep Off⁶:

	D-315	D-107	D115
Tanks Program Inputs:			
contents	IPE	Water w/ trace IPE&Phenol (used 100% IPE as conservative estimate)	IPE
Type of Tank	Vertical	Vertical	Vertical
shell height (ft)	16	18	18
shell diameter (ft)	25	29	20
maximum liquid height (ft)	14.4	17.0	17.0
average liquid height (ft)	12.8	0.5	0.5
Volume (gals)	52,877	89,000	42,000
Turnovers per year	0	0	0
Net Throughput (gals/yr)	0	0	0
Is Tank Heated?	N	N	N
roof color/shade	white/white	white/white	white/white
roof condition	good	good	good
roof type (cone or dome)	cone	cone	cone
height of cone	0	0	0
slope of cone roof (ft/ft)	0.0625	0.0625	0.0625
shell color/shade ³	white/white	white/white	white/white
shell condition	good	good	good
vacuum settings (inches H ₂ O), this is N ₂ makeup setting	1	1	1
pressure settings (inches H ₂ O), this is water depth in scrubber	10	10	10
vacuum settings (psig)	0.036	0.036	0.036
pressure settings (psig)	0.361	0.361	0.361
Tanks Program Outputs:			
Highest Monthly Emissions (June), lbs/mo	133.53	383.38	182.08
Additional Calcs:			
Pre-scrubber average lbs/hr (for note 5 outage)	0.19	0.53	0.25
Scrubber Efficiency	98%	98%	98%
Post-scrubber average lbs/hr (for note 4 outage)	0.004	0.011	0.005

⁶ Assume zero breathing loss from the phenol tanks due to decreasing or constant temperature.

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Cathy
EIQ I.D.: 303
Description: IPE Solvent Vent Scrubber C-402 (P&I.D. F402)

	Average Hourly Emissions¹ (lbs/hr)	Max Hourly Emissions² (lbs/hr)	Max Hourly Duration (hrs/yr)	Annual Emissions (tpy)
Phenol	<0.001	0.01	24	0.004
Isopropyl Ether	0.82	8.20	24	3.68
Total VOC	0.82	8.21		3.68

Notes:

¹ Phenol based on stack testing conducted by ESE, June 1995. The maximum of the three test runs was used. IPE based on stack testing conducted by SETCO, June 2005. The average and maximum are based on the maximum of the 4 test runs.

² Max hourly occurs during startups (condenser and scrubber operating, but higher than normal flow for short period of time). Assume maximum is 10 times the average. After shutdown, emissions are negligible for duration of outage because the vessel vents are valved closed.

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Cathy
EIQ I.D.: 304
Description: PC Flaker Vent Scrubber C-561 (P&I.D. F508)

	Removal Efficiency (%)	Normal Operation ³		Hot Water Flush		Overall Emissions		
		Emissions ¹ (lbs/hr)	Hrs/Yr	Emissions (lbs/hr) ²	Hrs/Yr	Average Hourly Emissions (lbs/hr)	Maximum Hourly Emissions (lbs/hr)	Annual Emissions (tpy)
Pyrocatechol	≥98	0.010	8744	0.300	16	0.011	0.300	0.046
Total VOC						0.011	0.300	0.046

Notes:

¹ Cathy Project Air Permit Data, Section 5, 3/6/90, outlet flow.

² Cathy Project Air Permit Data, Section 5, 3/6/90, inlet flow.

³ Includes a planned plant outage with the scrubber off. Emissions are less than or equal to normal emissions due to low vapor pressure materials. Scrubber will be back online before vessels are heated.

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Cathy
EIQ I.D.: 306
Description: Seal Pot D-669 For Chrystallization (P&I.D. F607)

	Removal Efficiency (%)	Average Hourly Emissions (lbs/hr)	Maximum Hourly Emissions (lbs/hr)	Annual Emissions (tpy)	Basis
other VOCs	0	0.005	0.01	0.02	1
Hydroquinone	0	0.01	0.02	0.04	1
Total VOC		0.015	0.03	0.06	

Notes:

¹ Average emission rates are from Cathy Project Air Permit Data, Section 5, 3/6/90.
Maximum emission rates are conservatively estimated as twice the average emission rates.

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Cathy
EIQ I.D.: 316
Description: Pressure Relief Filter Drying Vent Y-625 (P&I.D. F-603)

From Cathy Project Air Permit Data, Section 6, 3/6/90:

Flow of nitrogen per drying charge	225 SCF
charges per cycle	4
cycles per day	2
max conc of HQ in nitrogen	5.0E-05 lb/lb
MW of nitrogen	28 lb/lbmole
molar density	359 SCF/lbmole
HQ emitted per day	0.0070 lbs
HQ emitted per year	2.56 lbs
HQ max hourly (daily/2)	0.004 lbs/hr

	Average Hourly Emissions (lbs/hr)	Maximum Hourly Emissions (lbs/hr)	Annual Emissions ¹ (tpy)
HQ	0.0003	0.004	0.001
total VOC	0.0003	0.004	0.001

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Cathy
EIQ I.D.: 317
Description: Vacuum Clean-up Packaging Baghouse Y-760X (P&I.D. F703)

Drums of PM collected per year 10
Weight of drum 300 lbs
Total PM collected 3000 lbs/yr
Max hourly PM collected² 400 lbs/hr
Operating Hours: 8760
Efficiency of Dust Collector: 99.9%
Assumed Fraction that is HQ: 80.0%
Assumed Fraction that is PC: 20.0%

	Average Hourly Emission Rate (lb/hr)	Maximum Hourly Emission Rate (lb/hr)	Annual Emissions (tons/yr)
PM ₁₀	0.0003	0.40	0.002
HQ	0.0003	0.32	0.001
PC	0.0001	0.08	0.0003

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

PM Emissions From Baghouses:

EQ I.D.	Description	Material Handled (lbs/day)	Efficiency (%)	Operating Hours (hrs/yr)	PM10 Emissions		
					Average (lbs/hr)	Max ¹ (lbs/hr)	Annual (tpy)
307	Sulfite Metabasulfite Bag Dump Station Baghouse S-603 for D601	22.8	99.90%	8760	0.001	0.002	0.004
308	Oxalic Acid Bag Dump Station Baghouse S-663 for D660	22	99.90%	8760	0.001	0.002	0.004
309	DELETE						
310	Carbon Bag Dump Station Baghouse S-615 for D618	14	99.90%	8760	0.001	0.001	0.003

					PM10 Emissions			HQ Emissions				PC Emissions			
EQ I.D.	Description	Dust Collected (MT/yr)	Efficiency (%)	Operating Hours (hrs/yr)	Average (lbs/hr)	Max ¹ (lbs/hr)	Annual (tpy)	% HQ	Average (lbs/hr)	Max ¹ (lbs/hr)	Annual (tpy)	% PC	Average (lbs/hr)	Max ¹ (lbs/hr)	Annual (tpy)
203	Baghouse for HQ/PC Handling	1.0	98%	1000	0.045	0.090	0.022	100%	0.045	0.090	0.022	100%	0.045	0.090	0.022
311	PC Packaging Baghouse Y-731	10.0	98%	8760	0.051	0.103	0.224	0%				100%	0.051	0.103	0.224
312	HQ Packaging Baghouse Y-716	10.0	98%	8760	0.051	0.103	0.224	100%	0.051	0.103	0.224	0%			
313	HQ Rework Dumper Baghouse S-693 for D607 ²	1.0	98%	8760	0.005	0.010	0.022	100%	0.005	0.010	0.022	0%			

¹Maximum emissions assumed to be twice the average.

²Baghouse may or may not be used for HQ rework. If not used, majority of emissions are not air-borne and the amount emitted to atmosphere will be no more than listed here.

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Cathy
EIQ I.D.: 315A
Description: Backup Fluid Heater F-962 (P&I.D. F927)

	Average	Maximum
Heat Input (MMBtu/hr)	6	6
Fuel Flowrate (scfh)	6000	6000
Hrs. of Operation/Yr	3024	--

(24 hr/day, 7 days/wk, 18 wks/yr)

	Emission Factor (lb/MMscf) ¹	Average Hourly Emission Rate (lb/hr)	Maximum Hourly Emission Rate (lb/hr)	Annual Emissions (tons/yr)
PM ₁₀	7.6	0.046	0.046	0.069
SO ₂	0.6	0.004	0.004	0.005
NO _x	100	0.600	0.600	0.907
CO	84	0.504	0.504	0.762
VOC	5.5	0.033	0.033	0.050

Notes:

¹ AP-42 emission factors from Title 1, Chapter 4, *Natural Gas Combustion*, Tables 1.4-1,2,3, 7/98. NO_x and CO emission factors were based on a small boiler (<100 MMBTU/hr) with uncontrolled emissions.

Unit: Cathy
 EIQ I.D.: 315B
 Description: Primary Fluid Heater F-971 (P&I.D. F925)

	Average	Maximum
Heat Input (MMBtu/hr)	8	8
Fuel Flowrate (scfh)	8000	8000
Hrs. of Operation/Yr	8760	--

	Emission Factor (lb/MMscf) ¹	Average Hourly Emission Rate (lb/hr)	Maximum Hourly Emission Rate (lb/hr)	Annual Emissions (tons/yr)
PM ₁₀	7.6	0.061	0.061	0.266
SO ₂	0.6	0.005	0.005	0.021
NO _x	100	0.800	0.800	3.504
CO	84	0.672	0.672	2.943
VOC	5.5	0.044	0.044	0.193

Notes:

¹ AP-42 emission factors from Title 1, Chapter 4, *Natural Gas Combustion*, Tables 1.4-1,2,3, 7/98. NO_x and CO emission factors were based on a small boiler (<100 MMBTU/hr) with uncontrolled emissions.

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Emission Calculations

Unit: Cathy
EIQ I.D.: F-6C
Description: Cathy Fugitive Emissions

Cathy Unit Fugitive Emissions Percent Leakers: 1.5%

Type of Component	Service	Tagged Components ¹	Assumed Leakers ⁶	Assumed Non-Leakers ⁶	Assumed Screening Value (ppmw)	SOCMI Correlation Approach Emission Factor ³ (kg/hr/component)	SOCMI Default Zero Emission Factor ⁴ (kg/hr/component)	Total Emission Rate from Leaking Components (kg/hr)	Total Emission Rate from Non-leaking Components (kg/hr)	Total Emission Rate (kg/hr)	Hourly Emission Rate (lb/hr)
Valves	Heavy Liquid	95	1	94	10,000	0.010	4.90E-07	1.00E-02	4.61E-05	1.00E-02	2.22E-02
	Light Liquid	58	1	57	10,000	0.010	4.90E-07	1.00E-02	2.79E-05	1.00E-02	2.21E-02
	Gas Vapor	221	3	218	10,000	0.006	6.60E-07	1.80E-02	1.44E-04	1.81E-02	4.00E-02
Pumps	Heavy Liquid	3	0	3	10,000	0.038	7.50E-06	0.00E+00	2.25E-05	2.25E-05	4.96E-05
	Light Liquid	2	0	2	10,000	0.038	7.50E-06	0.00E+00	1.50E-05	1.50E-05	3.31E-05
Connectors	Heavy Liquid	148	2	146	10,000	0.011	6.10E-07	2.20E-02	8.91E-05	2.21E-02	4.87E-02
	Light Liquid	105	2	103	10,000	0.011	6.10E-07	2.20E-02	6.28E-05	2.21E-02	4.86E-02
	Gas Vapor	221	3	218	10,000	0.011	6.10E-07	3.30E-02	1.33E-04	3.31E-02	7.31E-02
PRDs	Heavy Liquid	1	0	1	10,000	0.038	7.50E-06	0.00E+00	7.50E-06	7.50E-06	1.65E-05
	Gas Vapor	19	0	19	10,000	0.038	7.50E-06	0.00E+00	1.43E-04	1.43E-04	3.14E-04
Compressors		0	--	--	--	--	--	--	--	--	--
Agitators		0	--	--	--	--	--	--	--	--	--
Total VOC											2.55E-01

Speciation of Emissions from the Cathy Unit

	Maximum % of Total Emissions	Hourly Emission Rate (lb/hr)	Annual Emission Rate (tpy)
Phenol	25%	0.064	0.279
Hydroquinone	1%	0.003	0.011
Pyrocatechol	1%	0.003	0.011
Total VOC		0.255	1.117

Unit: Daphne
 EIQ ID.: F-6D
 Description: Daphne Fugitive Emissions

Daphne Unit Fugitive Emissions Percent Leakers: 1.0%

Type of Component	Service	Tagged Components ¹	Assumed Leakers ⁶	Assumed Non-Leakers ⁶	Assumed Screening Value (ppmw)	SOCMI Correlation Approach Emission Factor ³ (kg/hr/component)	SOCMI Default Zero Emission Factor ⁴ (kg/hr/component)	Total Emission Rate from Leaking Components (kg/hr)	Total Emission Rate from Non-leaking Components (kg/hr)	Total Emission Rate (kg/hr)	Hourly Emission Rate (lb/hr)
Valves	Light Liquid	200	2	198	10,000	0.010	4.90E-07	2.00E-02	9.70E-05	2.01E-02	4.43E-02
	Gas Vapor	286	3	283	10,000	0.006	6.60E-07	1.80E-02	1.87E-04	1.82E-02	4.01E-02
Pumps	Light Liquid	8	0	8	10,000	0.038	7.50E-06	0.00E+00	6.00E-05	6.00E-05	1.32E-04
Connectors	Light Liquid	85	1	84	10,000	0.011	6.10E-07	1.10E-02	5.12E-05	1.11E-02	2.44E-02
	Gas Vapor	111	1	110	10,000	0.011	6.10E-07	1.10E-02	6.71E-05	1.11E-02	2.44E-02
PRDs	Light Liquid	3	0	3	10,000	0.038	7.50E-06	0.00E+00	2.25E-05	2.25E-05	4.96E-05
	Gas Vapor	19	0	19	10,000	0.038	7.50E-06	0.00E+00	1.43E-04	1.43E-04	3.14E-04
Compressors	Gas Vapor	1	0	1	10,000	0.038	7.50E-06	0.00E+00	7.50E-06	7.50E-06	1.65E-05
Agitators	Gas Vapor	2	0	2	10,000	0.038	7.50E-06	0.00E+00	1.50E-05	1.50E-05	3.31E-05
Total VOC											1.34E-01

Speciation of Emissions from the Daphne Uni

	Maximum % of Total Emissions	Hourly Emission Rate (lb/hr)	Annual Emission Rate (tpy)
Hydroquinone	1%	0.001	0.006
Pyrocatechol	5%	0.007	0.029
Methyl chloride	40%	0.053	0.234
Ethyl chloride	20%	0.027	0.117
Total VOC		0.134	0.586

Unit: Vanessa
 EIQLD.: F-6V
 Description: Vanessa Fugitive Emissions

Vanessa Unit Fugitive Emissions Percent Leakers: 0.5%

Type of Component	Service	Tagged Components ¹	Assumed Leakers ⁶	Assumed Non-Leakers ⁶	Assumed Screening Value (ppmw)	SOCMI Correlation Approach Emission Factor ³ (kg/hr/component)	SOCMI Default Zero Emission Factor ⁴ (kg/hr/component)	Total Emission Rate from Leaking Components (kg/hr)	Total Emission Rate from Non-leaking Components (kg/hr)	Total Emission Rate (kg/hr)	Hourly Emission Rate (lb/hr)
Valves	Light Liquid	611	3	608	10,000	0.010	4.90E-07	3.00E-02	2.98E-04	3.03E-02	6.68E-02
	Gas Vapor	166	1	165	10,000	0.006	6.60E-07	6.00E-03	1.09E-04	6.11E-03	1.35E-02
Pumps	Light Liquid	21	0	--	--	--	--	--	--	--	--
Connectors	Light Liquid	185	1	184	10,000	0.011	6.10E-07	1.10E-02	1.12E-04	1.11E-02	2.45E-02
	Gas Vapor	56	0	56	10,000	0.011	6.10E-07	0.00E+00	3.42E-05	3.42E-05	7.53E-05
PRDs	Light Liquid	3	0	3	10,000	0.038	7.50E-06	0.00E+00	2.25E-05	2.25E-05	4.96E-05
	Gas Vapor	20	0	20	10,000	0.038	7.50E-06	0.00E+00	1.50E-04	1.50E-04	3.31E-04
Compressors		0	--	--	--	--	--	--	--	--	--
Agitators		0	--	--	--	--	--	--	--	--	--
Total VOC											1.05E-01

Speciation of Emissions from the Vanessa Unit

	Estimated % of Total Emissions	Hourly Emission Rate (lb/hr)	Annual Emission Rate (tpy)
Methanol	40%	0.042	0.185
MTBK	60%	0.063	0.277
Total VOC		0.105	0.462

- Notes:
- ¹ Component counts from LeakDAS database January 2010. Most heavy liquid components are not tagged, but may contribute emissions. The assumed leak rate is conservatively high and should account for any additional emissions from non-tagged components.
- ³ EPA-453/R-95-017, *Protocol for Equipment Leak Emission Estimates*, November 1995, Table 2-9. SOCMI Leak Rate/Screening Value Correlations. Use LL valve equation for the HL valves.
- ⁴ EPA-453/R-95-017, *Protocol for Equipment Leak Emission Estimates*, November 1995, Table 2-11. Default-Zero Values: SOCMI Process Units.
- ⁶ All Vanessa pumps are dual mechanical seal and are assumed to have zero emissions. For other components, assumed percentage of components leaking: 1.5% for Cathy, 1.0% for Daphne, and 0.5% for Vanessa.

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Cathy, Vanessa
EQ I.D.: M-5
Description: Cathy (E925) and Vanessa (E907) Cooling Towers

Description	Recirculation Rate (gpm)	Conductivity ¹	TDS ² (ppm)	PM-10 Emissions ³ (lb/hr)	PM-10 Emissions (tpy)
Cathy Cooling Tower	9,000	3000	2190	2.01	8.80
Vanessa Cooling Tower	10,000	3000	2190	2.23	9.77
Total				4.24	18.57

¹ Conservative estimate based on control limits.

² TDS estimated to be 0.73 * (conductivity) per study conducted by Rhodia Lab.

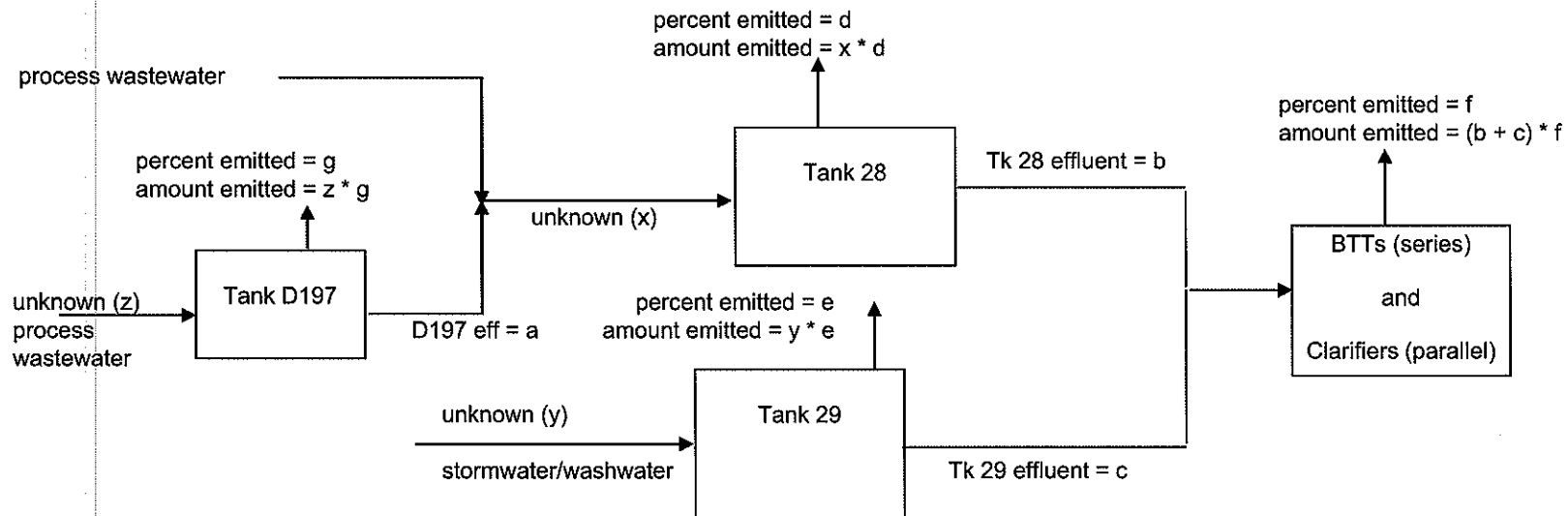
³ PM₁₀ emission rate = (Total Liq. Draft Factor) x (TDS) x (Recirculation Rate)
 where total liquid drift factor for induced draft tower = 1.7 lb/1000 gal (AP-42 Table 13.4-1)

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Cathyval Plant
EIQ I.D.: WWT
Description: Wastewater Treatment Plant

Overall Method:

Data collected on Tanks 28, 29, and D197 represent the effluents from these tanks. Water9 V2 is used to iteratively back-calculate influent and then fraction emitted.



$$z = a / (1 - g)$$

$$x = b / (1 - d)$$

$$y = c / (1 - e)$$

$$\text{Total emitted} = (z * g) + (x * d) + (y * e) + (b + c) * f$$

Input Data - Wastewater

	Units	Tank D197 Effluent (a)	Tank 28 Effluent (b)	Tank 29 Effluent (c)
Hydroquinone	ppmw	139	25.7	8.0
Pyrocatechol	ppmw	104	50	13
Phenol	ppmw	104	30	2
Methanol	ppmw		160	15
Isopropyl Ether	ppmw	50	47	8
MIBK	ppmw		138	12
Guaiacol	ppmw		150	27
Guetol	ppmw		200	27
Ethanol	ppmw		300	10
Veratrole	ppmw		100	8

Input Data - Tanks

	Units	Tank D197 (a)	Tank 28 (b)	Tank 29 (c)
Net Flow	gpm	48	260	290
Internal Recycle Flow	gpm	60	25	25
Total Flow	gpm	108	285	315
Wastewater temperature	C	31	25	25
Open Surface area of Tank	m ²	38.59	181.36	467.36
Density of liquid in tank	g/cc	1	1	1
Tank Diameter	m	7.01	15.2	24.4
Tank Height	m	4.88	12.2	12.2
Tank Vapor space height	m	4.12	2	2
Diurnal Temp. Change	C	12	12	12

Input Data - Aeration Basins

	Units	East Basin	West Basin
Wastewater Temperature	C	25	25
Length of aeration unit	m	43.3	43.3
Width of aeration unit	m	21.9	21.9
Depth of aeration unit	m	6.1	6.1
Area of agitation	m ²	47	47
Power of agitation	HP	7.5	7.5
Aerator effectiveness	alpha	0.83	0.83
Overall Biorate	mg/g bio-hr	19	19
Aeration air flow	m ³ /s	1.11	1.11
Activated Sludge Biomass	g/l	4	4

Input Data - Clarifiers

	Units	West Clarifier	East Clarifier
Wastewater Temperature	C	25	25
Secondary Clarifier Diameter	m	18.3	18.3
Secondary Clarifier Depth	m	4.27	4.27
Clarifier solids removal efficiency		99%	99%
Waterfall drop height	cm	30.48	30.48
Clarifier weir/circumference		0.5	0.5

Tank D197 Calculations

	Effluent (lbs/day) ¹ (a)	Percent Emitted ² (a)	Influent (lbs/day) ² (z)	Influent (ppm) ² (z)	Emissions (g/s) ³ (z*a)	Emissions (lbs/hr) (z*g)
Hydroquinone	80.03	0.000000	80.03	139.00	1.35E-07	0.000001
Pyrocatechol	59.88	0.143000	59.97	104.15	4.50E-04	0.003572
Phenol	59.88	0.125000	59.95	104.13	3.94E-04	0.003127
Methanol						
Isopropyl Ether	28.79	6.577000	30.82	53.52	1.07E-02	0.084923
MIBK						
Guaiacol						
Guetol						
Ethanol						
Veratrole						

Tank 28 Calculations

	Effluent (lbs/day) ¹ (b)	Percent Emitted ² (d)	Influent (lbs/day) ² (x)	Influent (ppm) ² (x)	Emissions (g/s) ³ (x*d)	Emissions (lbs/hr) (x*d)
Hydroquinone	80.15	0.00001	80.15	25.70	5.17E-08	0.000000
Pyrocatechol	155.94	0.06715	156.04	50.03	5.52E-04	0.004381
Phenol	93.56	0.06278	93.62	30.02	3.10E-04	0.002460
Methanol	499.00	2.56479	512.14	164.21	6.93E-02	0.550012
Isopropyl Ether	146.58	6.12720	156.15	50.07	5.04E-02	0.400009
MIBK	430.39	5.93374	457.54	146.71	1.43E-01	1.134946
Guaiacol	467.81	0.09830	468.27	150.15	2.43E-03	0.019286
Guetol	623.75	0.01999	623.88	200.04	6.57E-04	0.005214
Ethanol	935.63	1.81555	952.93	305.55	9.12E-02	0.723825
Veratrole	311.88	0.00009	311.88	100.00	1.49E-06	0.000012

Tank 29 Calculations

	Effluent (lbs/day) ¹ (c)	Percent Emitted ² (e)	Influent (lbs/day) ² (v)	Influent (ppm) ² (v)	Emissions (g/s) ³ (v*e)	Emissions (lbs/hr) (v*e)
Hydroquinone	27.83	0.00000	27.83	8.00	3.94E-08	0.000000
Pyrocatechol	45.22	1.47225	45.90	13.19	3.56E-04	0.002825
Phenol	6.96	0.13762	6.97	2.00	5.07E-05	0.000402
Methanol	52.18	5.61272	55.28	15.89	1.60E-02	0.126987
Isopropyl Ether	27.83	13.54435	32.19	9.25	2.30E-02	0.182544
MIBK	41.74	13.11341	48.04	13.81	3.32E-02	0.263498
Guaiacol	93.92	0.21553	94.13	27.06	1.07E-03	0.008492
Guetol	93.92	0.04382	93.96	27.01	2.17E-04	0.001722
Ethanol	34.79	3.97978	36.23	10.41	7.61E-03	0.060398
Veratrole	27.83	0.00022	27.83	8.00	2.92E-07	0.000002

BTTs/Clarifiers Calculations

		Percent Emitted ⁴ (h)	Influent (lbs/day) ⁵ (v)	Influent (ppm) ⁶ (v)	Emissions (g/s) ⁴ (v*e)	Emissions (lbs/hr) (v*e)
Hydroquinone		0.00000	107.98	16.37	4.51E-09	0.000000
Pyrocatechol		0.00200	201.16	30.49	2.53E-05	0.000201
Phenol		0.00000	100.52	15.24	3.65E-07	0.000003
Methanol		0.19400	551.18	83.55	5.62E-03	0.044604
Isopropyl Ether		0.36800	174.41	26.44	3.37E-03	0.026747
MIBK		1.73800	472.13	71.56	4.32E-02	0.342865
Guaiacol		0.00300	561.74	85.15	9.52E-05	0.000756
Guetol		0.00000	717.67	108.78	1.73E-05	0.000137
Ethanol		0.03200	970.41	147.09	1.65E-03	0.013096
Veratrole		0.00000	339.70	51.49	2.16E-08	0.000000

Total Emissions (HAPs in bold)

					For EIQ Form	
	D197 Emissions (lbs/hr)	Tk 28 Emissions (lbs/hr)	Tk 29 Emissions (lbs/hr)	BTTs/Clarifiers Emissions (lbs/hr)	Average Emissions (lbs/hr)	Annual Emissions (tpy)
Hydroquinone	0.00000107	0.00000041	0.00000031	0.00000004	0.000002	0.00001
Pyrocatechol	0.00357151	0.00438105	0.00282546	0.00020080	0.011	0.048
Phenol	0.00312705	0.00246037	0.00040239	0.00000290	0.006	0.026
Methanol	0.00000000	0.55001213	0.12698693	0.04460416	0.722	3.161
Isopropyl Ether	0.08492251	0.40000882	0.18254371	0.02674662	0.694	3.041
MIBK	0.00000000	1.13494566	0.26349787	0.34286470	1.741	7.627
Guaiacol	0.00000000	0.01928614	0.00849225	0.00075557	0.029	0.125
Guaiacol	0.00000000	0.00521440	0.00172226	0.00013730	0.007	0.031
Ethanol	0.00000000	0.72382548	0.06039816	0.01309553	0.797	3.492
Veratrole	0.00000000	0.00001183	0.00000232	0.00000017	0.00001	0.0001
Total VOC	0.09162214	2.84014628	0.64687165	0.42840779	4.007	17.55

Notes:

¹ Calculated from concentration and flow.

² Determined iteratively by Water9. First, set influent = effluent as initial guess, then use Water 9 to calculate percent emitted. Use this result to back-calculate influent from effluent. Then, run Water9 again using improved estimate of influent. Repeat as needed.

³ Water9 result using back-calculated influent.

⁴ Water9 result.

⁵ Sum of Tank 28 and Tank 29 effluents.

⁶ Flow-weighted average of Tank 28 and Tank 29 effluents.

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Cathy, Daphne & Vanessa
EIQ I.D.: M-6
Description: Cathyval Sumps

Input Data - Wastewater

	Units	Cathy High Risk Sump	Cathy Low Risk Sump	Daphne & Vanessa Process Sump
Pyrocatechol	ppmw	91	3.3	0.8
Phenol	ppmw	71	3.48	--
Hydroquinone	ppmw	158	0.45	--
Isopropyl Ether	ppmw	30	4.2	2.1
MIBK	ppmw	--	--	0.6
Guaiacol	ppmw	--	--	3.2

Input Data - Sumps

	Units	Cathy High Risk Sump ¹	Cathy Low Risk Sump ²	Daphne & Vanessa Process Sump ²
Flow	gpm	12.9	66.4	132.9
Underflow T	C	25	25	25
Area of openings at unit	cm ²	843.8	731.15	675.4
Radius of drop pipe	cm	5	5	5
Drop length to conduit	cm	61	61	61
Radius of underflow conduit	cm	3.81	13.97	6.8
Distance to next unit	cm	500	500	500
Slope of underflow conduit		0.015	0.015	0.015
Open surface of liquid at the unit	cm ²	62710	233419	348386
Flow entrance depth	cm	45.72	38.11	30.5
Depth of liquid in sump	cm	213	213	50
Velocity air at opening	ft/min	88	88	88

Cathy High Risk Sump Calculations

	Effluent (lbs/day) ¹	Percent Emitted ²	Influent (lbs/day) ²	Influent (ppm) ²	Emissions (g/s) ³	Emissions (lbs/hr)
Pyrocatechol	14.08	1.49E-04	14.08	91.00	8.95E-08	0.000001
Phenol	10.99	8.63E-02	11.00	71.06	5.05E-05	0.000401
Hydroquinone	24.45	0.00E+00	24.45	158.00	7.60E-09	0.000000
Isopropyl Ether	4.64	3.10E-01	4.66	30.09	7.73E-05	0.000614
MIBK						
Guaiacol						

Cathy Low Risk Sump Calculations

	Effluent (lbs/day) ¹	Percent Emitted ²	Influent (lbs/day) ²	Influent (ppm) ²	Emissions (g/s) ³	Emissions (lbs/hr)
Pyrocatechol	2.63	0.00E+00	2.63	3.30	1.21E-08	0.000000
Phenol	2.77	7.38E-02	2.78	3.48	1.08E-05	0.000086
Hydroquinone	0.36	0.00E+00	0.36	0.45	8.04E-11	0.000000
Isopropyl Ether	3.35	5.74E-01	3.37	4.22	1.02E-04	0.000810
MIBK						
Guaiacol						

Daphne and Vanessa Process Sump Calculations

	Effluent (lbs/day) ¹	Percent Emitted ²	Influent (lbs/day) ²	Influent (ppm) ²	Emissions (g/s) ³	Emissions (lbs/hr)
Pyrocatechol	1.27	0.00E+00	1.27	0.80	4.37E-09	0.000000
Phenol		-				
Hydroquinone		-				
Isopropyl Ether	3.35	1.55E+00	3.40	2.13	2.79E-04	0.002214
MIBK	0.96	1.01E+00	0.97	0.61	5.17E-05	0.000410
Guaiacol	5.10	2.23E-02	5.10	3.20	6.02E-06	0.000048

Total Emissions (HAPs in bold)

				For EIQ Form	
	Cathy High Risk Sump (lbs/hr)	Cathy Low Risk Sump (lbs/hr)	Daphne & Vanessa Process Sump (lbs/hr)	Average Emissions (lbs/hr)	Annual Emissions (tpy)
Pyrocatechol	7.10E-07	9.60E-08	3.47E-08	0.000	0.000
Phenol	4.01E-04	8.57E-05	0.00E+00	0.000	0.002
Hydroquinone	6.03E-08	6.38E-10	0.00E+00	0.000	0.000
Isopropyl Ether	6.14E-04	8.10E-04	2.21E-03	0.004	0.016
MIBK	0.00E+00	0.00E+00	4.10E-04	0.000	0.002
Guaiacol	0.00E+00	0.00E+00	4.78E-05	0.000	0.000
Total VOC				0.0046	0.02

¹ Calculated from concentration and flow.

² Determined iteratively by Water9. First, set influent = effluent as initial guess, then use Water 9 to calculate fraction

³ Water9 result using back-calculated influent.

⁴ Water9 result.

EMISSIONS SUMMARY

EPN	PM ₁₀	SO ₂	NO _x	CO	VOC Total	Ethyl chloride	Hydroquinone	Methanol	Methyl chloride	Methyl isobutyl ketone	Phenol	Pyrocatechol
101	0	0	0	0	0.16	-	-	<0.01	-	0.16	-	-
102	0	0	0	0	0.01	-	-	-	-	-	-	-
103	0	0	0	0	0.05	-	-	-	-	-	-	-
104	0	0	0	0	0.12	-	-	-	-	0.12	-	-
105	0	0	0	0	-	-	-	-	-	-	-	-
106	0	0	0	0	0.90	-	-	-	-	0.90	-	-
107	0	0	0	0	0.01	-	-	-	-	0.01	-	-
108	0	0	0	0	0.01	-	-	0.01	-	-	-	-
109	0.07	0	0	0	0	-	-	-	-	-	-	-
110	0	0	0	0	0.01	-	-	-	-	-	-	-
111	0	0	0	0	0.08	-	-	0.01	-	<0.01	-	-
201	0	0	0	0	0.03	-	-	-	-	-	-	0.03
202	0	0	0	0	0.78	-	<0.01	<0.01	-	-	-	0.02
203	0.02	0	0	0	0	-	0.02	-	-	-	-	0.02
301	0	0	0	0	0.19	-	<0.01	-	-	-	0.17	0.02
302	0	0	0	0	0.34	-	-	-	-	-	0.02	-
303	0	0	0	0	3.68	-	-	-	-	-	<0.01	-
304	0	0	0	0	0.05	-	-	-	-	-	-	0.05
306	0	-	-	-	0.06	-	0.04	-	-	-	-	-
307	<0.01	0	0	0	0	-	-	-	-	-	-	-
308	<0.01	0	0	0	0	-	-	-	-	-	-	-
309	-	0	0	0	0	-	-	-	-	-	-	-
310	<0.01	0	0	0	0	-	-	-	-	-	-	-
311	0.22	0	0	0	0	-	-	-	-	-	-	0.22
312	0.22	0	0	0	0	-	0.22	-	-	-	-	-
313	0.02	0	0	0	0	-	0.02	-	-	-	-	-
315A	0.07	0.01	0.91	0.76	0.05	-	-	-	-	-	-	-
315B	0.27	0.02	3.50	2.94	0.19	-	-	-	-	-	-	-
316	-	0	0	0	<0.01	-	<0.01	-	-	-	-	-
317	<0.01	0	0	0	0	-	<0.01	-	-	-	-	<0.01
F-6C	0	0	0	0	1.12	-	0.01	-	-	-	0.28	0.01
F-6D	0	0	0	0	0.59	0.12	0.01	-	0.23	-	-	0.03
F-6V	0	0	0	0	0.46	-	-	0.18	-	0.28	-	-
WWT	0	0	0	0	17.55	-	-	3.16	-	7.63	0.03	0.05
M-5	18.57	0	0	0	0	-	-	-	-	-	-	-
M-6	0	0	0	0	0.02	-	-	-	-	<0.01	<0.01	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
Total	19.51	0.03	4.41	3.71	26.46	0.12	0.37	3.38	0.23	9.11	0.51	0.47

SECTION 7.0

CERTIFICATE OF GOOD STANDING



Louisiana Secretary of State
COMMERCIAL DIVISION
Corporations Database



*Louisiana Secretary of State
Detailed Record*

Charter/Organization ID: 34605553F

Name: RHODIA INC.

Type Entity: Business Corporation (Non-Louisiana)

Status: Active

Annual Report Status: In Good Standing **Add Certificate of Good Standing to Shopping Cart**

Last Report Filed on 02/09/2007

Mailing Address: 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Domicile Address: 1209 ORANGE STREET, WILMINGTON, DE 19801

Principal Office: 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Principal Bus. Est. in Louisiana: 1275 AIRLINE HIGHWAY, BATON ROUGE, LA 70805

Qualified: 01/13/1998

Registered Agent (Appointed 1/13/1998): C T CORPORATION SYSTEM, 8550 UNITED PLAZA BLVD., BATON ROUGE, LA 70809

President: JAMES HARTON, 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Director: JAMES HARTON, 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

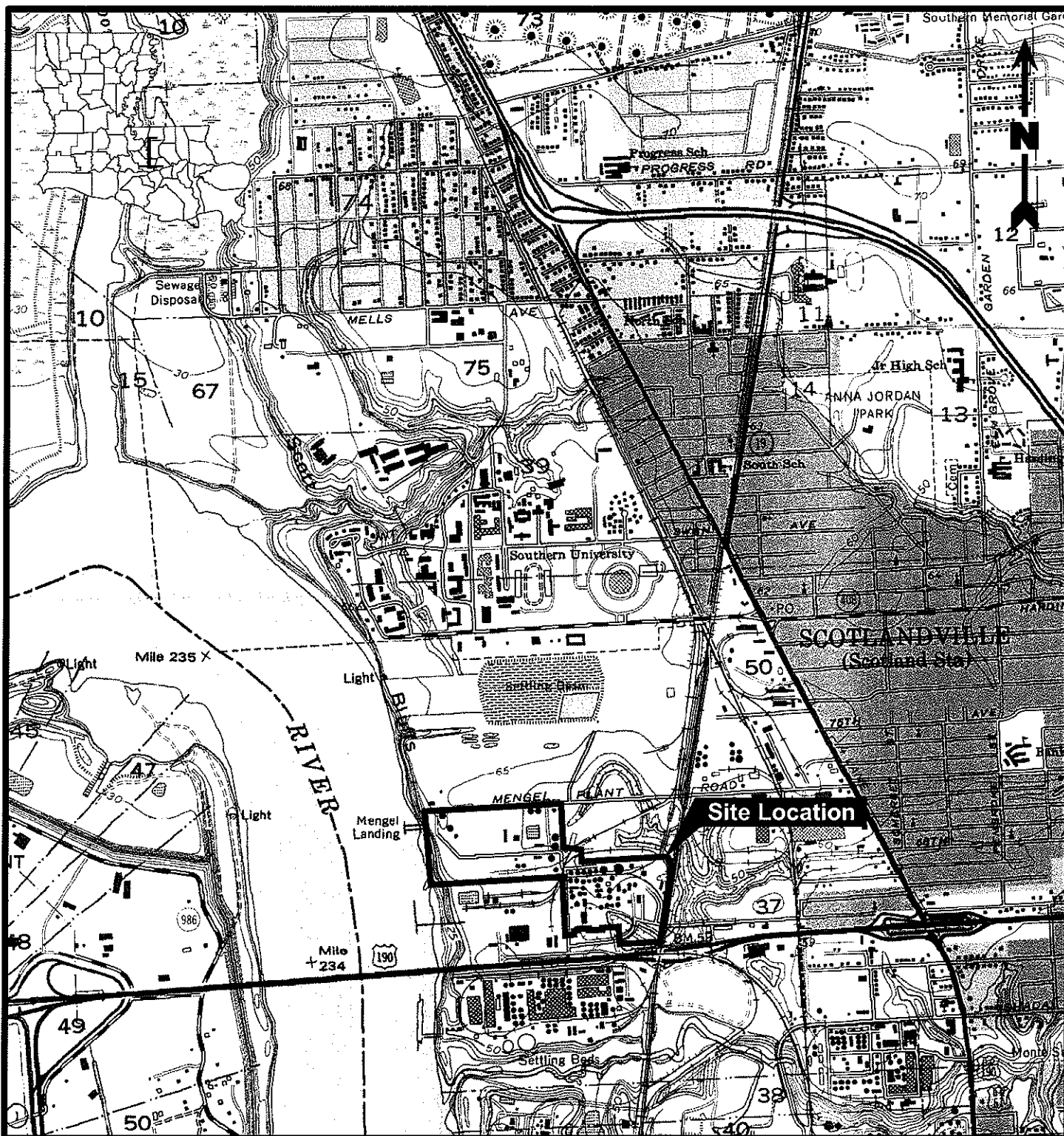
Vice President: JERRY KRING, 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Vice President: JOHN P. DONAHUE, 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Secretary: JOHN P. DONAHUE, 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Additional officers may exist on document

FIGURE 1
SITE LOCATION MAP



0 1,000 2,000 4,000
Feet

Site Location Map

East Baton Rouge Parish

Rhodia Inc.
Baton Rouge, Louisiana



PROVIDENCE

ENGINEERING & ENVIRONMENTAL GROUP LLC

Reference

Base map comprised of U.S.G.S. 7.5 minute topographic map, "Scotlandville, LA" dated 1963 revised 1994. Image is referenced to UTM NAD 83 Zone 15.

Doc. Code: 015-003

Drawn: LMH

Dwg. No.: 015-003-A020

Checked:

Approved:

Date: 02/02/05

1
Figure

APPENDIX A

**LETTER OF APPROVAL OF ALTERNATE MEANS OF
COMPLIANCE**



DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

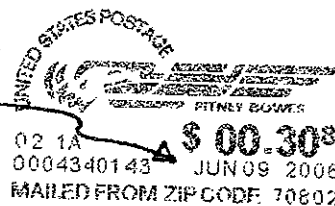
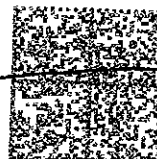
SECRETARY

File 407.1.6.3

April 24, 2006

Rec'd

PRESORTED
FIRST CLASS



Mr. John Richardson
Rhodia, Inc.
PO Box 828
Baton Rouge, LA 70821

RE: Alternative Monitoring Request for Scrubber C-402
Stack Test: June 29, 2005
Permit Number: 2184-V0, Agency Interest #: 1314
TEMPO #: ENG20060003

Dear Mr. Richardson:

The Louisiana Department of Environmental Quality (LDEQ) received the above referenced report on November 28, 2005. The report summarizes the results of the compliance tests performed by SETCO. Engineering Support of LDEQ has reviewed the report and this letter covers the findings.

The test procedures and calculations presented in the report were found to be acceptable. There was a pre-test meeting with the Department on June 7, 2005.

Methods 1A, 2A, 3 and 4 were used to determine sample points, stack gas velocity, volumetric flow rate, molecular weight, and moisture content on the inlet and outlet vent. Isopropyl ether gaseous emission samples were collected with a NIOSH Method 1618 sampling system and subsequently analyzed by Method 1618 by gas chromatography.

TRE index values were calculated by the incinerator and flare equations outlined in LAC:33:III.2147.D. The performance test series consisted of 4 1-hour runs. The following table shows the results.

Scrubber C-402	Run 1	Run 2	Run 3	Run 4
Scrubber Flow, gpm	4	4	6	8
Isopropyl Ether, lb/hr	0.82	0.16	0.54	0.20
Required TRE	1	1	1	1
TRE Index Value	5.98	28.54	8.90	23.60

ENVIRONMENTAL ASSESSMENT

: PO BOX 4314, BATON ROUGE, LA 70821-4314

P:225-219-3236 F:225-219-3239

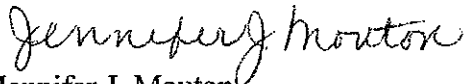
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Mr. John Richardson
Rhodia, Inc.
Page 2

Rhodia has requested that the scrubber flow rate be monitored as an alternative to LAC:33:III.2147.E.4.a. The minimum flow rate required by the permit is 4gpm. The scrubber is equipped with a low flow alarm. It is the opinion of Engineering Support that this alternative is acceptable. All other Specific Requirements of the permit must be complied with.

If you have any questions concerning the review of this request, please contact Jennifer Pelloat at 225-219-3432.

Sincerely,



Jennifer J. Mouton
Engineering Support Manager
Air Quality Assessment Division

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

A/AE/PE 110000450100
J.V.10

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No. 7005 0390 0001 6881 0910

Activity No.: PER20100003
Agency Interest No. 1314

Mr. Daniel Tate
Plant Manager
Rhodia Inc.
PO Box 828
Baton Rouge, LA 70821-0828

RE: Part 70 Operating Permit
Rhodia Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana

Dear Mr. Tate:

This is to inform you that the permit renewal/modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the 25 of April, 2016, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this 25 day of April, 2011.

Permit No.: 2184-V2

Sincerely,

Sam L. Phillips
Assistant Secretary
SLP:dhb
c: EPA Region VI

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AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CATHYVAL Plant
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Rhodia Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana

I. Background

Rhodia Inc. operates the CATHYVAL Plant located in Baton Rouge, East Baton Rouge Parish, Louisiana. The facility produces fine specialty organic chemicals that are used in food, fragrances, pharmaceuticals, and as laboratory reagents. The CATHYVAL Plant currently operates under Title V Permit No. 2184-V1, issued on August 20, 2007, and amended on September 4, 2007.

II. Origin

A permit application and Emission Inventory Questionnaire were submitted by Rhodia Inc. on February 11, 2010 requesting a Part 70 operating permit renewal/modification. An addendum to the application was received on August 6, 2010.

III. Description

The CATHYVAL Plant consists of the Cathy, Daphne, and Vanessa production units, and a Wastewater Treatment Unit. Steam to operate these units is supplied by the waste heat boilers of the Sulfuric Acid Plant.

Cathy Unit

The Cathy Unit produces pyrocatechol and hydroquinone for use as a raw material at the Daphne Unit and hydroquinone (HQ) for outside sales. Pyrocatechol and hydroquinone are synthesized using a proprietary Rhodia hydroxylation process. Phenol and hydrogen peroxide react to form pyrocatechol and hydroquinone. The reaction mixture is dissolved in a light organic solvent in the extraction section. Unreacted phenol is removed using distillation and recycled back to the process. Waste acids and salts from the reaction are extracted in an aqueous phase and sent to waste water treatment. Recovered phenol is recycled and the tars are sent to the acid plant to be burned as fuel. Products (hydroquinone and pyrocatechol) are then separated in the splitter. Finally, pyrocatechol is transferred to storage in molten form or flaked and packaged and hydroquinone is crystallized, centrifuged, dried, and packaged. Pyrocatechol may also be mixed with a solvent and shipped as a liquid for certain customers.

Daphne Unit

The Daphne unit synthesizes guaiacol and guetol using a proprietary Rhodia process. Production of guaiacol and guetol from pyrocatechol is similar except that the guetol process

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uses ethyl chloride as a reactant, whereas the guaiacol process uses methyl chloride. Veratrole and *o*-diethoxybenzene (ODEB) are produced as co-products for outside sales.

Guaiacol is produced by a methylation process using pyrocatechol, methyl chloride, and caustic in the presence of water and a light organic solvent. Guetol is produced by an ethylation process using pyrocatechol, ethyl chloride, and caustic in the presence of water and a light organic solvent. The phases are separated, and organics in the aqueous layer are then removed by solvent extraction. The residual aqueous layer is sent to the waste treatment unit. The recovered mixture of organics and solvent is distilled to recover and recycle the solvent. It is then further distilled to recover pure guaiacol/guetol and veratrole/ODEB. The pure guaiacol/guetol is sent to the Vanessa Unit, or shipped to external customers by bulk shipments or in drums. Veratrole and ODEB are purified by washing and further distillation then shipped to external customers by bulk shipments or in drums. Heavy impurities from the distillations are sent to the acid plant to be burned as fuel.

The Daphne Unit operates in series with the Cathy and Vanessa Units, and runs more efficiently. Due to this higher efficiency, Rhodia may also utilize the Daphne Unit to manufacture para-methoxy-phenol (PMP) in place of guaiacol/guetol and veratrole/ODEB.

PMP and its byproduct para-di-methoxy-benzene (PDMB) are manufactured by methylation of HQ using methyl chloride. HQ produced by the Cathy Unit, or received from external suppliers, is used as a feedstock. The separation steps are similar to the guaiacol/guetol process. No purification of PDMB is necessary. PMP is shipped in bulk as a molten liquid.

Vanessa Unit

The Vanessa Unit synthesizes vanillin and ethyl vanillin utilizing a proprietary Rhodia process. In vanillin production, guaiacol reacts with sodium hydroxide to form sodium guaiacolate. Sodium guaiacolate is then condensed with glyoxylic acid to form sodium mandelate in the condensation section. In the extraction/distillation section, the unreacted guaiacol is then extracted with solvent. The organic phase is distilled and the aqueous phase is stripped to recover the guaiacol and solvent for recycle. In the oxidation area, the aqueous mandelate solution is reacted with air and caustic in the presence of a catalyst to form vanillate. The aqueous vanillate solution is neutralized to form the product vanillin. The vanillin is then extracted with solvent. After recovery and recycling of the solvent, the vanillin is purified by washing and distillation and converted to the solid product by flaking or crystallizing and drying. Crystallized product is packaged into boxes or other containers. Flaked product is packaged in super-sacks. Ethyl vanillin is manufactured through the same series of steps by substituting guetol for guaiacol.

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Wastewater Treatment Unit

All liquid effluents from the CATHYVAL Plant are routed to the Wastewater Treatment Unit via Tank 28 and/or Tank 29. The effluent is sent to the aeration basins where it is treated aerobically with an activated sludge process. The sludge is then separated from the liquid effluent in the clarifiers and solid-liquid separation equipment.

The clarified effluent is then discharged to the Mississippi River. All stormwater from the CATHYVAL Plant will be discharged to the Mississippi River after it has been flushed into Tank 29 (EQT 119) to prevent potential contamination (oil, zinc, etc.) from reaching the river. The stored stormwater from Tank 29 (EQT 119) is used as dilution water and treated as normal effluent into the aerobic/activated sludge process.

Air Emissions Control Measures

The primary emissions from the CATHYVAL Plant process are volatile organic compounds (VOCs), some of which are HAP/TAPs, and particulate matter (PM₁₀). There is a small amount of natural gas combustion emissions as well. The CATHYVAL plant is not a major Title V source on its own, but is subject to Title V permitting due to its co-location with the Sulfuric Acid Plant.

Any vent streams containing the chlorinated hydrocarbons methyl chloride and ethyl chloride are vented conveyed to the sulfuric acid regeneration furnaces in the acid plant (primarily Sulfuric Acid Unit No. 1, EPN 3, with Unit No. 2, EPN 2, as a backup) for combustion and HCl control. Non-chlorinated vent streams containing light organics are controlled by condensers and scrubbers. The effluent from the scrubbers is either recycled within the process or sent to the wastewater treatment unit. Some of the water sent to the wastewater treatment unit is first sent to a stripper, where organics are recovered and recycled to the process. The scrubbers are equipped with a continuous water flow meter as well as a high pressure drop alarm to ensure proper performance.

Modifications

With this permit modification/renewal, Rhodia accomplishes the following changes:

- Add Analyzer Vents to the Insignificant Activities list.
- Update the calculations for the cooling towers (EQT0125).
- Add the tote loading of o-vanillin into the General Condition XVII list.
- Add Predephenoling Vent Condenser E-318 (EQT0289) and Detarring Condenser E-506 (EQT0290) to the equipment list.
- Delete EQT0108 Pre-Coat Bag Dump Station Baghouse S-631 for D-628
- Alter the Specific Requirements section as follows:

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- Add requirements for the scrubbers (EQTs 009, 0015, 0019, 0021, 0028, 0031, 0040, 0045, 0051, 0052, 0056, 0076, 0082, 0089, 0094) to state that the scrubbers must operate at all times, except for specific named scenarios for which there are no emissions or for which there are minimal emissions that have been quantified and included in the permit emission limits.
- Add the following requirement to EQTs 0076, 0082, and 0094: "Up to 16 hours per year, if/when the scrubber becomes plugged during normal operation, scrubber water temperature will be increased to remove pluggage and restore proper operation."
- Add a requirement to the condensers EQT0289 & 0251 allowing the condensers to stop operation if the equipment vented to them is emptied of organic contents and washed or either emits only breathing losses or has a valve line that can be closed.
- Move the specific requirement contained in both EQT0082 Scrubber C-319 and EQT0089 Scrubber C-402 regarding the maximum water temperature to EQT0289 Condenser E-318 and EQT0251 Condenser E-401 respectively.
- Revise the specific requirement in EQT0087 to note that the 98% control standard per LAC 33:III.2115 does not apply when the unit is shutdown.

The addendum from Rhodia that was received by LDEQ on August 6, 2010, accomplishes the follow additional changes:

- Reduce minimum scrubber water flow rate for scrubber C-419 (EQT 0028) from 42.0 gpm to 18.0 gpm while increasing VOC emission rate from 0.08 to 0.53 tpy. The minimal increase in air emissions from this scrubber (overall plant HAP emissions decrease with this permit) results in significant reduction in water and energy consumption.
- Correct an error in the Tanks program inputs for EQT0201. Total VOCs increase from 0.03 to 0.04 tpy.
- Include an improved (lower) estimate of maximum hourly emissions from EI0301 Scrubber C-209.
- Correct the natural gas heating value for heaters EQT0113 (EPN:315A) and EQT0114 (EPN:315B) from 1000 to 1040 Btu/scf, resulting in a slight decrease in permitted emission rates.
- Correct a typo in the WWT emission calculations; there is no resulting change to emission rates.
- Add two fire pump diesel engines EQT286 (M-8A) and EQT287 with requirements for 40 CFR 63 Subpart ZZZZ, LAC 33:III.1101.B and LAC 33:III.1311.C. The engines are grouped together in GRP0022.
- Add one emergency diesel generator, EQT288 (M-9)

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Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	7.74	1.98	-5.76
SO ₂	0.03	0.16	+0.13
NO _x	4.41	6.19	+1.78
CO	3.70	3.98	+0.28
VOC *	25.02	27.09	+2.07

*VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
Ethyl Chloride	0.12	0.12	-
Hydroquinone	1.13	0.36	-0.77
Methanol	3.50	3.38	-0.12
Methyl Chloride	0.23	0.23	-
Methyl isobutyl ketone	9.74	9.46	-0.28
Phenol	0.49	0.52	+0.03
Pyrocatechol	0.72	0.46	-0.26
Total HAPs	15.93	14.53	-1.40

IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD), does not apply.

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51. The facility is not a major source of hazardous air pollutants (HAPs).

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V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. Public Notice

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on March 3, 2011. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on February 28, 2011. The draft permit was also submitted to US EPA Region VI on February 22, 2011. No comments were received.

VII. Effects on Ambient Air

Emissions associated with the proposed modification were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions for this modification. However, in March 2005, modeling was performed. The results are shown below.

Dispersion Model(s) Used: Unknown

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Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
MIBK	8-hour	323 µg/mg	4880

VIII. General Condition XVII Activities

Emission Rates - tons

Work Activity	PM ₁₀	SO ₂	NO _x	CO	VOC	Other
Collecting 220 process samples/day for quality assurance in 4 oz bottles and assuming that a max of 1% is emitted to the atmosphere.					0.01	PC <0.01 HQ <0.01 Phenol <0.01 MIBK <0.01 MeOH <0.01 EtCl <0.01 MeCl <0.01
Drum Loading, unloading, and heating					0.22	
Phenol melting					0.02	Phenol 0.02
Maintenance activities including: Opening/removing pumps, compressors, instruments, valves, vents, and piping; Vessel/equipment/tank truck/ISO container/rail car openings; Filter and strainer change-outs; Miscellaneous equipment cleaning; Nitrogen/steam/air clearing of equipment and lines; Waste handling/re-packaging					0.25	PC 0.03 HQ 0.03 Phenol 0.03 MIBK 0.03 MeOH 0.03 EtCl 0.03 MeCl 0.03
Temporary storage of materials in tank trucks or ISO containers					0.05	PC 0.03 HQ <0.01
Portable Diesel Water Pump(s)	0.15	0.14	2.05	0.44	0.17	
Fugitive dust	0.05					
Tote Loading of o-Vanillin					0.07	

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IX. Insignificant Activities

ID No.:	Description	Physical/Operating	Citation
	Defoamer for Tars Process	55 gallon drums	LAC 33:III.501.B.5.A.2
	Defoamer for WWTU	55 gallon drums	LAC 33:III.501.B.5.A.2
	Polymer for WWTU – Vulcan 4864	250 gallon totes	LAC 33:III.501.B.5.A.2
D-309X	Clarifier Polymer Feed Tank	1050 gallons	LAC 33:III.501.B.5.A.3
D-407X	Filter Polymer Feed Tank	1690 gallons	LAC 33:III.501.B.5.A.3
D-317X	Polymer Makeup Tank	880 gallons	LAC 33:III.501.B.5.A.3
D-320	Clarifier Floating Layer Tank	750 gallons	LAC 33:III.501.B.5.A.3
D-323	Clarifier Underflow Tank	3170 gallons	LAC 33:III.501.B.5.A.3
D-316	Effluent Pump Tank	4300 gallons	LAC 33:III.501.B.5.A.3
D-420	Filtrate Tank	1260 gallons	LAC 33:III.501.B.5.A.3
C-104	Perchloric Acid Tank, P&ID F103	Vents to Y-132	LAC 33:III.501.B.5.A.4
D-101	H ₂ O ₂ Tank P&ID F102	Vents to Y-120V	LAC 33:III.501.B.5.A.4
D-102	H ₂ O ₂ Tank P&ID F102	Vents to Y-121V	LAC 33:III.501.B.5.A.4
D-106	Polyphosphoric Acid Tank, P&ID F103	Vents to Y-136	LAC 33:III.501.B.5.A.4
D-605	Metabisulfate Injection Tank, P&ID F601	Vents to atmosphere	LAC 33:III.501.B.5.A.4
D-664	Oxalic Acid Injection Drum	Vents to atmosphere	LAC 33:III.501.B.5.A.4
	4 Laboratory Vents	N/A	LAC 33:III.501.B.5.A.6
	Analyzer Vents	N/A	LAC 33:III.501.B.5.A.9
D-186	Vanessa Caustic Storage	100,900 gallons	LAC 33:III.501.B.5.B.40
D-305	Cathy Caustic Storage, P&ID F-302	1200 gallons	LAC 33:III.501.B.5.B.40
C-210	Daphne Caustic Storage	1200 gallons	LAC 33:III.501.B.5.B.40
C-243	Sulfuric Acid Dilution Tank	958 gallons	LAC 33:III.501.B.5.D

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X. Applicable Louisiana and Federal Air Quality Requirements																		
ID No.:	Description	LAC 33:III. Chapter																
		1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	2115	2147	2149	2153	9	11	51	56	59*
UNF01	CATHYVAL Plant	1							1					1	1	1	1	1
EQT 9	101 - LIGHTS TANK FARM SCRUBBER C-165						2				2	2						
EQT 10	D-148 - VANILLIN SOLVENT 1 TANK (METHANOL STORAGE)					1												
EQT 11	D-149 - ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)					1												
EQT 12	D-152 - SOLVENT 2 TANK (MIBK STORAGE)					1												
EQT 13	D-153 - SOLVENT 2 TANK (MIBK STORAGE)					1												
EQT 14	D-169 - SOLVENT 3 TANK (METHANOL STORAGE)					1												
EQT 15	102 - HEAVIES TANK FARM SCRUBBER C-187						2				2	2						
EQT 16	D-107 (Vanessa) - GUAIACOL STORAGE TANK					1												
EQT 17	D-111 (Vanessa) - GUETOL STORAGE TANK					1												
EQT 18	D-113 - 50% GLYOXYLIC ACID STORAGE TANK					1												
EQT 19	103 - CONDENSATION SCRUBBER C-201										2	2						
EQT 20	C-216 - GUAIACOL RECYCLE TANK					1												

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EQT 21	104 - SOLVENT 1 VENT SCRUBBER C-248										2	2						
EQT 22	C-236 - NEUTRALIZATION SURGE TANK					1												
EQT 23	C-240 - EXTRACTOR TAILS UPSET TANK					1												
EQT 24	C-243 - EXTRACTOR 1 TAILS SAFETY DECANTER									1								
EQT 25	C-244 - MANDELATE SURGE TANK					1												
EQT 26	C-249 - SOLVENT 1 SURGE TANK					1												
EQT 27	C-247 - SOLVENT 1 WASHING SAFETY DECANTER									1								
EQT 28	105 - OXIDATION SCRUBBER C-419										2							
EQT 29	C-409 - MANDELATE SURGE TANK					1												
EQT 30	D-417 - OXIDATION SURGE TANK					1												
EQT 31	106 - VANILLIN EXTRACTION SCRUBBER C-427					1				1	2	2						
EQT 32	C-421 - SOLVENT 2 SURGE TANK					1												
EQT 33	C-430 - SOLVENT 2 DECANTER									1								
EQT 34	C-432 - EXTRACTION 2 DRAIN TANK					1												
EQT 35	C-434 - EXTRACTION 2 TAILS SAFETY DECANTER									1								

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		1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	2115	2147	2149	2153	9	11	51	56	59*
EQT 36	C-441 - AQUEOUS PHASE SURGE TANK					1												
EQT 37	C-501 - SOLVENT 2 DISTILLATION SURGE TANK					1												
EQT 38	C-558 - AQUEOUS EFFLUENTS TANK					1												
EQT 39	C-575 - SOLVENT 2 RECOVERY DECANter									1								
EQT 40	107 DISTILLATION SCRUBBER C-557										2	2						
EQT 41	C-535 - TARS SURGE TANK					1												
EQT 42	C-616 - FLAKER SURGE TANK					1												
EQT 43	C-648 - RECYCLE PRODUCT HOPPER MELTER									1								
EQT 44	C-655 - MELTER SURGE TANK					1												
EQT 45	108 - CRYSTALLIZATION SCRUBBER C-624					1					2	2						
EQT 46	C-541 - METHANOL WASHING DRUM (Vents through C-801)									1								
EQT 47	C-801 - SOLVENT 3 RECOVERY FEED TANK					1												
EQT 48	C-603 - DISOLVER									1								
EQT 49	C-606 - VACUUM CRYSTALLIZER									1								
EQT 50	C-617 - CENTRIFUGE SURGE TANK					1												

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		1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	2115	2147	2149	2153	9	11	51	56	59*
EQT 51	109 - BAGHOUSE FILTER/SCRUBBER C-704		1	2														
EQT 52	201 - TANK FARM SCRUBBER C- 146						2				2	2						
EQT 53	D-111 (Daphne) - PYROCATECHOL STORAGE TANK					1												
EQT 54	D-128 - TARS STORAGE TANK					1												
EQT 55	D-141 - VERATROLE STORAGE TANK					1												
EQT 56	202 - VENT SCRUBBER C-685										2	2						
EQT 57	C-201 - PC DISSOLUTION TANK											1						
EQT 58	C-553 - GUAIACOL DISTILLATION FEED TANK					1												
EQT 59	C-561 - RECYCLE PROCESS WATER TANK					1												
EQT 60	C-603 - GUAIACOL DISTILLATION TANK											1						
EQT 61	C-615 - TARS RECEIVER					1												
EQT 62	C-645 - PMDB RECEIVER					1												
EQT 63	C-651 - PC RECEIVER					1												
EQT 64	C-655 - GUAIACOL LT. ENDS RECEIVER					1												
EQT 65	C-660 - INTERS./VERATROLE RECEIVER					1												
EQT 66	C-665 - SECOND RECEIVER					1												

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EQT 67	C-670 - END OF CAMPAIGN RECEIVER					1												
EQT 68	C-675 - GUAIACOL RECEIVER					1												
EQT 69	C-701 - CRUDE VERATROLE WASH TANK											1						
EQT 70	C-705 - WATER GUAIACOLATE RECEIVER					1												
EQT 71	C-710 - CAUSTIC WASH RECEIVER					1												
EQT 72	C-751 - VERATROLE DISTILLATION KETTLE											1						
EQT 73	C-765 - LT. ENDS RECEIVER					1												
EQT 74	C-770 - DISTILLED VERATROLE RECEIVER					1												
EQT 75	203 - BAGHOUSE FOR HQ HANDLING		1	2														
EQT 76	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)										2	2						
EQT 77	C-223 - PHENOL DRAIN TANK REACTION SURGE DRUM									1								
EQT 78	C-416 - PREDEPHENOL REFLUX DRUM									1								
EQT 79	C-508 - VERTICAL TAR DILUTER									1								
EQT 80	C-530 - DISTILLATION DRAIN TANK									1								
EQT 81	C-532 - TAILS SURGE DRUM									1								

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CATHYVAL Plant
Agency Interest No.: 1314
Rhodia Inc.

Baton Rouge, East Baton Rouge Parish, Louisiana

X. Applicable Louisiana and Federal Air Quality Requirements																		
ID No.:	Description	LAC 33:III. Chapter																
		1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	2115	2147	2149	2153	9	11	51	56	59*
EQT 82	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)									1	2	2						
EQT 83	C-113 - PHENOL UNLOADING TANK									1								
EQT 84	D-107 - WASHWATER TANK					1												
EQT 85	D-111 - PHENOL MAKE-UP TANK					1												
EQT 86	D-115 - WASHWATER/GUAIACOL TANK					1												
EQT 87	D-315 - RAFFINATE TANK									1								
EQT 88	D-204 - RECYCLE PHENOL TANK									1								
EQT 89	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)										1	2						
EQT 90	C-320 - IPE STORAGE TANK									1								
EQT 91	C-308 - IPE SETTLER									1								
EQT 92	C-311 - WASHWATER DRUM									1								
EQT 93	C-322 - ETHER DRAIN TANK									1								
EQT 94	304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)										2	2						
EQT 95	C-551 - PC RECEIVING DRUM									1								
EQT 96	C-563 - PC FLAKER FEED TANK									1								

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ID No.:	Description	LAC 33:III. Chapter																
		1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	2115	2147	2149	2153	9	11	51	56	59*
EQT 97	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)										2	2						
EQT 98	C-650 - REFLUX SURGE DRUM									1								
EQT 99	D-607 - HQ DISSOLVER TANK									1								
EQT100	D-610 - HQ SURGE TANK									1								
EQT101	D-612 - CARBON TREATER TANK									1								
EQT102	D-632 - CRYSTALLIZATION TANK									1								
EQT103	D-652 - MOTHER LIQUOR SURGE TANK									1								
EQT104	D-653 - CONC. COLUMN FEED TANK									1								
EQT105	D-657 - MOTHER LIQUOR SURGE DRUM									1								
EQT106	307 - SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601		1	2														
EQT107	308 - OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)		1	2														
EQT109	310 - CARBON BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)		1	2														
EQT110	311 - PC PACKAGING BAGHOUSE Y-731 (P&I.D. F703)		1	2														
EQT111	312 - HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)		1	2														

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ID No.:	Description	LAC 33:III. Chapter																
		1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	2115	2147	2149	2153	9	11	51	56	59*
EQT112	313 - HQ REWORK DUMPER BAGHOUSE S-693 FOR D607 (P&I.D. F602)		1	2														
EQT113	315A - FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)				1										1			
EQT114	315B - PRIMARY FLUID HEATER F-971 (P&I.D. F925)				1										1			
EQT115	316 - PRESSURE LEAF FILTER DRYING VENT Y-625		1	2														
EQT116	317 - VACUUM CLEAN-UP PACKAGING BAGHOUSE Y-760X (P&I.D. F703)		1	2														
GRP014	EMISSIONS CAP - WW TREATMENT PLANT												1					
EQT118	401A - WWT TANK NO. 28 (P&I.D. F101)																	
EQT119	401B - Stormwater Tank NO. 29 (P&I.D. F101)																	
EQT120	401C - TANK D-197																	
EQT121	402A - WEST AERATION BASIN D210																	
EQT122	402B - EAST AERATION BASIN D213 (P&I.D. F201)																	
EQT123	402C - WEST CLARIFIER D301 (P&I.D. F302)																	
EQT124	402D - EAST CLARIFIER D304 (P&I.D. F302)																	

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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ID No.:	Description	LAC 33:III. Chapter																
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EQT125	M-5 - CATHY (E925) AND VANESSA (E907) COOLING TOWERS (P&I.D. F903)		1	2														
EQT126	M-6 - CATHYVAL SUMPS												2					
EQT127	C-101 - IPE SOLVENT STORAGE TANK					1												
EQT128	C-351 - RAG LAYER DIVERTING TANK											1						
EQT129	C-401 - AQUEOUS PHASE SURGE TANK					1												
EQT130	C-352 - RAG LAYER SURGE TANK					1												
EQT131	C-461 - AQUEOUS EFFLUENT TANK					1												
EQT132	C-521 - ORGANIC PHASE SURGE TANKC					1												
EQT133	C-132 - MeCl STORAGE TANK					1												
EQT134	C-136 - EtCl STORAGE TANK					1												
EQT135	C-301 - ACIDIFICATION/DECANTATION TANK											1						
EQT136	C-503 - DEETHERATION IPE DECANTER									1								
EQT137	D-681 - SCREENER RESIDUE DISSOLVER									1								
EQT139	110 - HIGH PURITY PC MIXING VESSEL						2			1								
EQT188	C-202 - PREMIXING REACTOR									1								

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ID No.:	Description	LAC 33:III. Chapter																
		1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	2115	2147	2149	2153	9	11	51	56	59*
EQT189	C-207 - VERATROLE STRIPPER									1								
EQT190	C-217 - NO. 1 CONDENSATION RTR.									1								
EQT191	C-219 - NO. 2 CONDENSATION RTR.									1								
EQT192	C-221 - NO. 3 CONDENSATION RTR.									1								
EQT193	C-223 - NO. 4 CONDENSATION RTR.									1								
EQT194	C-225 - NO. 5 CONDENSATION RTR.									1								
EQT195	C-227 - POLISHING REACTOR (RTR)									1								
EQT196	C-241 - GUAIACOL EXTRACTION COLUMN									1								
EQT197	C-245 - SOLVENT 1 WASHING COLUMN									1								
EQT198	C-301 - GUAIACOL RECOVERY COLUMN									1								
EQT199	C-306 - GUAIACOL/TARS SEPARATOR									1								
EQT200	C-312 - SOLVENT 1 STRIPPER DECANTER									1								
EQT201	C-314 - SOLVENT 1 STRIPPER									1								
EQT202	C-316 - SOLVENT 1 COLD TRAP TANK									1								
EQT203	C-320 - GUAIACOL DISTILLATION REFLUX DRUM									1								

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ID No.:	Description	LAC 33:III. Chapter																
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EQT204	C-322X - SOLVENT 1 VACUUM PACKAGE SEPARATOR									1								
EQT205	H-317 - VACUUM SYSTEM									1								
EQT206	C-407 - OXIDATION REACTOR									1								
EQT207	C-416 - OXIDATION COLUMN									1								
EQT208	C-429 - CO2 SEPARATOR									1								
EQT209	C-435 - VANILLIN EXTRACTION COLUMN TANK									1								
EQT210	C-440 - SOLVENT 2 WASHING COLUMN									1								
EQT211	C-504 - VANILLIN/ SOLVENT 2 ATM. DISTILLATION COLUMN									1								
EQT212	C-507 - VANILLIN/ SOLVENT 2 VACUUM DISTILLATION COLUMN									1								
EQT213	C-516 - SOLVENT 2 COLD TRAP									1								
EQT214	C-533X - SOLVENT 2 VACUUM PACKAGE SEPARATOR									1								
EQT215	C-565 - SOLVENT 2 RECOVERY COLUMN									1								
EQT216	C-568 - SOLVENT 2 RECOVERY COLUMN									1								
EQT217	E-428 - CONDENSER									1								
EQT218	H-520 - VACUUM SYSTEM									1								
EQT219	C-525 - TARS REMOVAL COLUMN									1								
EQT220	C-529 - TARS BY-PASS									1								

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ID No.:	Description	LAC 33:III. Chapter															
		1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	2115	2147	2149	2153	9	11	51	56 59*
EQT221	C-545 - LIGHTS REMOVAL COLUMN									1							
EQT222	C-555A/B - VANILLIN COLD TRAPS									1							
EQT223	C-562 - VANILLIN PURIFICATION VACUUM PACKAGE SEPARATOR									1							
EQT224	H-556 - VACUUM SYSTEM									1							
EQT225	C-634X - DRYER SCRUBBER									1							
EQT226	C-637X - CRYSTALLIZATION VACUUM SEPARATOR									1							
EQT227	C-640 - DRYER									1							
EQT228	C-805 - SOLVENT 3 RECOVERY COLUMN									1							
EQT229	H-619 - VACUUM SYSTEM									1							
EQT230	Y-620 - CENTRIFUGE A									1							
EQT231	Y-621 - CENTRIFUGE B									1							
EQT232	Y-640 - DRYER									1							
EQT233	C-606 - GUAIACOL DISTILLATION COLUMN											1					
EQT234	C-633X - GUAIACOL VACUUM PACKAGE SEPARATOR											1					
EQT235	C-678A/B - GUAIACOL DISTILLATION COLD TRAPS											1					
EQT236	C-754 - VERATROLE DISTILLATION COLUMN											1					

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ID No.:	Description	LAC 33:III. Chapter																
		1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	2115	2147	2149	2153	9	11	51	56	59*
EQT237	C-783X - VERATROLE VACUUM SEPARATOR											1						
EQT238	C-787 - VERATROLE DISTILLATION COLD TRAPS											1						
EQT239	C-213 - FIRST RTR										1							
EQT240	C-215 - SECOND RTR										1							
EQT241	C-217 - THIRD RTR										1							
EQT242	C-219 - FOURTH RTR										1							
EQT243	C-231 - FIFTH RTR										1							
EQT244	C-501 - DETARRING COLUMN										1							
EQT245	C-521 - FINAL DEPHENOLING COLUMN										1							
EQT246	E-418 - PHENOL CONDENSER										1							
EQT247	H-524 - VACUUM SYSTEM										1							
EQT248	C-301 - WATER STRIPPER										1							
EQT249	C-313 - EXTRACTION COLUMN										1							
EQT250	C-405 - DEHYDRATION COLUMN										1							
EQT251	E-401 - SOLVENT VENT CONDENSER										1							
EQT252	C-536 - SPLITTER COLUMN (PC/HQ SEP)										1							
EQT253	H-545 - VACUUM SYSTEM										1							
EQT254	S-560 - PC FLAKER									1								
EQT255	C-251 - BATCH RTR											1						

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EQT256	H-640 - VACUUM SYSTEM FOR CRYSTALLIZERS									1								
EQT257	C-451 - EXTRACTION COLUMN									1								
EQT258	C-501 - DEETHERATION COLMN									1								
EQT259	C-511 - DEETHERATION QUAIACOL DECANter									1								
EQT260	C-551 - CRUDE GUAIACOL DEHYDRATION COLUMN									1								
EQT261	C-555 - WET GUAIACOL TANK					1												
EQT286	Fire-Water Pump G972A			1											1			
EQT287	Fire-Water Pump G972B			1											1			
EQT288	M-9 Emergency Diesel Generator for Daphne/Vanessa Sump			1											1			
EQT289	E-318 Predephenoling Vent Condenser									1								
EQT290	E-506 Detarring Condenser										1							
GRP022	Fire Pump Diesel Engines			1											1			
FUG1	F-6V - VANESSA FUGITIVE EMISSIONS							1										
FUG4	F-6C - CATHY FUGITIVE EMISSIONS							1										
FUG5	F-6D - DAPHNE FUGITIVE EMISSIONS							1										

* The regulations indicated above are State Only regulations.

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▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
-The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR			
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
UNF01	CATHYVAL Plant	2					2	2	2	2	2	2		2	2	2	1	2	1	1	1
EQT 9	101 - LIGHTS TANK FARM SCRUBBER C-165																				
EQT 10	D-148 - VANILLIN SOLVENT 1 TANK (METHANOL STORAGE)																				
EQT 11	D-149 - ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)																				
EQT 12	D-152 - SOLVENT 2 TANK (MIBK STORAGE)																				
EQT 13	D-153 - SOLVENT 2 TANK (MIBK STORAGE)																				
EQT 14	D-169 - SOLVENT 3 TANK (METHANOL STORAGE)																				
EQT 15	102 - HEAVIES TANK FARM SCRUBBER C-187																				
EQT 16	D-107 (Vanessa) - GUAIACOL STORAGE TANK				2																
EQT 17	D-111 (Vanessa) - GUETOL STORAGE TANK				2																
EQT 18	D-113 - 50% GLYOXYLIC ACID STORAGE TANK				2																
EQT 19	103 - CONDENSATION SCRUBBER C-201																				
EQT 20	C-216 - GUAIACOL																				

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		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82	
	RECYCLE TANK																					
EQT 21	104 - SOLVENT 1 VENT SCRUBBER C-248																					
EQT 22	C-236 - NEUTRALIZATION SURGE TANK																					
EQT 23	C-240 - EXTRACTOR TAILS UPSET TANK																					
EQT 24	C-242 - EXTRACTOR 1 TAILS SAFETY DECANTER																					
EQT 25	C-244 - MANDELATE SURGE TANK																					
EQT 26	C-249 - SOLVENT 1 SURGE TANK																					
EQT 27	C-247 - SOLVENT 1 WASHING SAFETY DECANTER																					
EQT 28	105 - OXIDATION SCRUBBER C-419																					
EQT 29	C-409 - MANDELATE SURGE TANK																					
EQT 30	C-417 - OXIDATION SURGE TANK				2																	
EQT 31	106 - VANILLIN EXTRACTION SCRUBBER C-427																					
EQT 32	C-421 - SOLVENT 2 SURGE TANK C-421																					
EQT 33	C-430 - SOLVENT 2																					

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	DECANTER																				
EQT 34	C-432 - EXTRACTION 2 DRAIN TANK																				
EQT 35	C-434 - EXTRACTION 2 TAILS SAFETY DECANTER																				
EQT 36	C-441 - AQUEOUS PHASE SURGE TANK																				
EQT 37	C-501 - SOLVENT 2 DISTILLATION SURGE TANK																				
EQT 38	C-558 - AQUEOUS EFFLUENTS TANK C																				
EQT 39	C-575 - SOLVENT 2 RECOVERY DECANTER																				
EQT 40	107 DISTILLATION SCRUBBER C-557																				
EQT 41	C-535 - TARS SURGE TANK																				
EQT 42	C-616 - FLAKER SURGE TANK																				
EQT 43	C-648 - RECYCLE PRODUCT HOPPER MELTER																				
EQT 44	C-655 - MELTER SURGE TANK																				
EQT 45	108 - CRYSTALLIZATION SCRUBBER																				

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ID No.	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR			
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EQT 46	C-541 - METHANOL WASHING DRUM C-541 (Vents through C-801)																				
EQT 47	C-801 - SOLVENT 3 RECOVERY FEED TANK																				
EQT 48	C-603 - DISOLVER																				
EQT 49	C-606 - VACUUM CRYSTALLIZER																				
EQT 50	C-617 - CENTRIFUGE SURGE TANK																				
EQT 51	109 - BAGHOUSE FILTER/SCRUBBER C-704																				
EQT 52	201 - TANK FARM SCRUBBER C-146																				
EQT 53	D-111 (Daphne) - PYROCATECHOL STORAGE TANK				2																
EQT 54	D-128 - TARS STORAGE TANK																				
EQT 55	D-141 - VERATROLE STORAGE TANK																				
EQT 56	202 - VENT SCRUBBER C-685																				
EQT 57	C-201 - PC DISSOLUTION TANK C-201																				
EQT 58	C-553 - GUAIACOL DISTILLATION FEED TANK																				

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		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT 59	C-561 - RECYCLE PROCESS WATER TANK																				
EQT 60	C-603 - GUAIACOL DISTILLATION TANK																				
EQT 61	C-615 - TARS RECEIVER																				
EQT 62	C-645 - PMDB RECEIVER																				
EQT 63	C-651 - PC RECEIVER																				
EQT 64	C-655 - GUAIACOL LT. ENDS RECEIVER																				
EQT 65	C-660 - INTERS./VERATROLE RECEIVER																				
EQT 66	C-665 - SECOND RECEIVER																				
EQT 67	C-670 - END OF CAMPAIGN RECEIVER																				
EQT 68	C-675 - GUAIACOL RECEIVER																				
EQT 69	C-701 - CRUDE VERATROLE WASH TANK																				
EQT 70	C-705 - WATER GUAIACOLATE RECEIVER																				
EQT 71	C-710 - CAUSTIC WASH RECEIVER																				
EQT 72	C-751 - VERATROLE DISTILLATION KETTLE																				

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EQT 73	C-765 - LT. ENDS RECEIVER																					
EQT 74	C-770 - DISTILLED VERATROLE RECEIVER																					
EQT 75	203 - BAGHOUSE FOR HQ HANDLING																					
EQT 76	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)																					
EQT 77	C-223 - PHENOL DRAIN TANK REACTION SURGE DRUM C-223																					
EQT 78	C-416 - PREDEPHENOL REFLUX DRUM																					
EQT 79	C-508 - VERTICAL TAR DILUTER																					
EQT 80	C-530 - DISTILLATION DRAN TANK																					
EQT 81	C-532 - TAILS SURGE DRUM C-																					
EQT 82	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)																					
EQT 83	C-113 - PHENOL UNLOADING TANK																					
EQT 84	D-107 - WASHWATER TANK				2																	
EQT 85	D-111 - PHENOL MAKE-UP TANK				2																	

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Agency Interest No.: 1314
Rhodia Inc.

Baton Rouge, East Baton Rouge Parish, Louisiana

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR			
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT 86	D-115 - WASHWATER/GUAIAC OL TANK				2																
EQT 87	D-315 - RAFFINATE TANK																				
EQT 88	D-204 - RECYCLE PHENOL TANK																				
EQT 89	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)																				
EQT 90	C-320 - IPE STORAGE TANK																				
EQT 91	C-308 - IPE SETTLER																				
EQT 92	C-311 - WASHWATER DRUM																				
EQT 93	C-322 - ETHER DRAIN TANK																				
EQT 94	304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)																				
EQT 95	C-551 - PC RECEIVING DRUM																				
EQT 96	C-563 - PC FLAKER FEED TANK																				
EQT 97	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)																				
EQT 98	C-650 - REFLUX SURGE																				

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CATHYVAL Plant

Agency Interest No.: 1314

Rhodia Inc.

Baton Rouge, East Baton Rouge Parish, Louisiana

X. Applicable Louisiana and Federal Air Quality Requirements																					
ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR			
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
	DRUM																				
EQT 99	D-607 - HQ DISSOLVER TANK																				
EQT100	D-610 - HQ SURGE TANK																				
EQT101	D-612 - CARBON TREATER TANK																				
EQT102	D-632 - CRYSTALLIZATION TANK																				
EQT103	D-652 - MOTHER LIQUOR SURGE TANK																				
EQT104	D-653 - CONC. COLUMN FEED TANK																				
EQT105	D-657 - MOTHER LIQUOR SURGE DRUM																				
EQT106	307 - SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601																				
EQT107	308 - OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)																				
EQT109	310 - CARBON BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)																				
EQT110	311 - PC PACKAGING																				

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR			
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
	BAGHOUSE Y-731 (P&I.D. F703)																				
EQT111	312 - HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)																				
EQT112	313 - HQ REWORK DUMPER BAGHOUSE S- 693 FOR D607 (P&I.D. F602)																				
EQT113	315A - FLUID HEATER F- 962 (BACK-UP) (P&I.D. F927)																				
EQT114	315B - PRIMARY FLUID HEATER F-971 (P&I.D. F925)																				
EQT115	316 - PRESSURE LEAF FILTER DRYING VENT Y-625																				
EQT116	317 - VACUUM CLEAN- UP PACKAGING BAGHOUSE Y-760X (P&I.D. F703)																				
GRP014	EMISSIONS CAP - WW TREATMENT PLANT																				
EQT118	401A - WWT TANK NO. 28 (P&I.D. F101)																				
EQT119	401B - Stormwater Tank No. 29 (P&I.D. F101)																				
EQT120	401C - TANK D-197																				
EQT121	402A - WEST AERATION																				

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X. Applicable Louisiana and Federal Air Quality Requirements																						
ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR				
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82	
	BASIN D210																					
EQT122	402B - EAST AERATION BASIN D213 (P&I.D. F201)																					
EQT123	402C - WEST CLARIFIER D301 (P&I.D. F302)																					
EQT124	402D - EAST CLARIFIER D304 (P&I.D. F302)																					
EQT125	M-5 - CATHY (E925) AND VANESSA (E907) COOLING TOWERS (P&I.D. F903)																					
EQT126	M-6 - CATHYVAL SUMPS																					
EQT127	C-101 - IPE SOLVENT STORAGE TANK																					
EQT128	C-351 - RAG LAYER DIVERTING TANK																					
EQT129	C-401 - AQUEOUS PHASE SURGE TANK																					
EQT130	C-352 - RAG LAYER SURGE TANK																					
EQT131	C-461 - AQUEOUS EFFLUENT TANK																					
EQT132	C-521 - ORGANIC PHASE SURGE TANKC																					
EQT133	C-132 - MeCl STORAGE TANK																					
EQT134	C-136 - EtCl STORAGE																					

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR			
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
	TANK																				
EQT135	C-301 - ACIDIFICATION/DECAN TATION TANK																				
EQT136	C-503 - DEETHERATION IPE DECANter																				
EQT137	D-681 - SCREENER RESIDUE DISSOLVER																				
EQT139	110 - HIGH PURITY PC MIXING VESSEL																				
EQT188	C-202 - PREMIXING REACTOR																				
EQT189	C-207 - VERATROLE STRIPPER																				
EQT190	C-217 - NO. 1 CONDENSATION RTR.																				
EQT191	C-219 - NO. 2 CONDENSATION RTR.																				
EQT192	C-221 - NO. 3 CONDENSATION RTR.																				
EQT193	C-223 - NO. 4 CONDENSATION RTR.																				
EQT194	C-225 - NO. 5 CONDENSATION RTR.																				
EQT195	C-227 - POLISHING REACTOR (RTR)																				
EQT196	C-241 - GUAIACOL EXTRACTION COLUMN																				
EQT197	C-245 - SOLVENT 1 WASHING COLUMN																				

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X. Applicable Louisiana and Federal Air Quality Requirements																					
ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR			
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT198	C-301 - GUAIACOL RECOVERY COLUMN																				
EQT199	C-306 - GUAIACOL/TARS SEPARATOR																				
EQT200	C-312 - SOLVENT 1 STRIPPER DECANter																				
EQT201	C-314 - SOLVENT 1 STRIPPER																				
EQT202	C-316 - SOLVENT 1 COLD TRAP TANK																				
EQT203	C-320 - GUAIACOL DISTILLATION REFLUX DRUM																				
EQT204	C-322X - SOLVENT 1 VACUUM PACKAGE SEPARATOR																				
EQT205	H-317 - VACUUM SYSTEM																				
EQT206	C-407 - OXIDATION REACTOR																				
EQT207	C-416 - OXIDATION COLUMN																				
EQT208	C-429 - CO2 SEPARATOR																				
EQT209	C-435 - VANILLIN EXTRACTION COLUMN TANK																				
EQT210	C-440 - SOLVENT 2 WASHING COLUMN																				
EQT211	C-504 - VANILLIN/ SOLVENT 2 ATM.																				

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR			
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
	DISTILLATION COLUMN																				
EQT212	C-507 - VANILLIN/ SOLVENT 2 VACUUM DISTILLATION COLUMN																				
EQT213	C-516 - SOLVENT 2 COLD TRAP																				
EQT214	C-533X - SOLVENT 2 VACUUM PACKAGE SEPARATOR																				
EQT215	C-565 - SOLVENT 2 RECOVERY COLUMN																				
EQT216	C-568 - SOLVENT 2 RECOVERY COLUMN																				
EQT217	E-428 - DONDENSER																				
EQT218	H-520 - VACUUM SYSTEM																				
EQT219	C-525 - TARS REMOVAL COLUMN																				
EQT220	C-529 - TARS BY-PASS																				
EQT221	C-545 - LIGHTS REMOVAL COLUMN																				
EQT222	C-555A/B - VANILLIN COLD TRAPS																				
EQT223	C-562 - VANILLIN PURIFICATION VACUUM PACKAGE SEPARATOR																				
EQT224	H-556 - VACUUM																				

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X. Applicable Louisiana and Federal Air Quality Requirements																						
ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR				
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82	
	SYSTEM																					
EQT225	C-634X - DRYER SCRUBBER																					
EQT226	C-637X - CRYSTALLIZATION VACUUM SEPARATOR																					
EQT227	C-640 - DRYER																					
EQT228	C-805 - SOLVENT 3 RECOVERY COLUMN																					
EQT229	H-619 - VACUUM SYSTEM																					
EQT230	Y-620 - CENTRIFUGE A																					
EQT231	Y-621 - CENTRIFUGE B																					
EQT232	Y-640 - DRYER																					
EQT233	C-606 - GUAIACOL DISTILLATION COLUMN																					
EQT234	C-633X - GUAIACOL VAUUM PACKAGE SEPARATOR																					
EQT235	C-678A/B - GUAIACOL DISTILLATION COLD TRAPS																					
EQT236	C-754 - VERATROLE DISTILLATION COLUMN																					
EQT237	C-783X - VERATROLE VACUUM SEPARATOR																					
EQT238	C-787 - VERATROLE DISTILLATION COLD																					

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR			
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
	TRAPS																				
EQT239	C-213 - FIRST RTR																				
EQT240	C-215 - SECOND RTR																				
EQT241	C-217 - THIRD RTR																				
EQT242	C-219 - FOURTH RTR																				
EQT243	C-231 - FIFTH RTR																				
EQT244	C-501 - DETARRING COLUMN																				
EQT245	C-521 - FINAL DEPHENOLING COLUMN																				
EQT246	E-418 - PHENOL CONDENSER																				
EQT247	H-524 - VACUUM SYSTEM																				
EQT248	C-301 - WATER STRIPPER																				
EQT249	C-313 - EXTRACTION COLUMN																				
EQT250	C-405 - DEHYDRATION COLUMN																				
EQT251	E-401 - SOLVENT VENT CONDENSER																				
EQT252	C-536 - SPLITTER COLUMN (PC/HQ SEP)																				
EQT253	H-545 - VACUUM SYSTEM																				
EQT254	S-560 - PC FLAKER																				
EQT255	C-251 - BATCH RTR																				

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X. Applicable Louisiana and Federal Air Quality Requirements																					
ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR			
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT256	H-640 - VACUUM SYSTEM FOR CRYSTALLIZERS																				
EQT257	C-451 - EXTRACTION COLUMN																				
EQT258	C-501 - DEETHERATION COLMN																				
EQT259	C-511 - DEETHERATION QUAIACOL DECANter																				
EQT260	C-551 - CRUDE GUAIACOL DEHYDRATION COLUMN																				
EQT261	C-555 - WET GUAIACOL TANK																				
EQT286	Fire-Water Pump G972A																1				
EQT287	Fire-Water Pump G972B																1				
EQT288	M-9 Emergency Diesel Generator for Daphne/Vanessa Sump																1				
EQT289	E-318 Predephenoling Vent Condenser																				
EQT290	E-506 Detarring Condenser																				
GRP022	Fire Pump Diesel Engines																1				
FUG1	F-6V - VANESSA FUGITIVE EMISSIONS					2															
FUG4	F-6C - CATHY FUGITIVE EMISSIONS					1															
FUG5	F-6D - DAPHNE FUGITIVE EMISSIONS					2															

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KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
-The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

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XI. Table 2. Explanation for Exemption Status or Non-applicability of a Source		
ID No.	Requirement	Notes
UNF001 Facility	NESHAP Part 60 Subpart A - General Provision	DOES NOT APPLY. No Part 60 standards apply in the CathyVal Plant.
	NSPS Part 60 Subpart III - Standards of Performance for VOC Emissions From the SOCMi Air Oxidation Unit Processes	DOES NOT APPLY. The CathyVal Plant does not produce any of the chemicals listed in 40 CFR 60.617 as products, co-products, by-products, or intermediates.
	NSPS Part 60 Subpart NNN - Standards of Performance for VOC Emissions from SOCMi Distillation Operations.	DOES NOT APPLY. The CathyVal Plant does not produce any of the chemicals listed in 40 CFR 60.617 as products, co-products, by-products, or intermediates.
	NSPS Part 60 Subpart RRR - Standards of Performance for VOC Emissions from SOCMi Reactor Processes	DOES NOT APPLY. The CathyVal Plant does not produce any of the chemicals listed in 40 CFR 60.617 as products, co-products, by-products, or intermediates.
	NSPS Part 60 Subpart YYY - Volatile Organic Compound Emissions from the SOCMi Wastewater (Proposed)	DOES NOT APPLY. The Cathy, Daphne, and Vanessa units do not produce SOCMi chemicals as primary products. Therefore, they are not affected facilities under NSPS YYY. Hydroquinone is not the primary product of the unit.
	NESHAP Part 61 Subpart A - General Provisions	DOES NOT APPLY. No Part 61 standards apply in the CathyVal Plant.
	NESHAP Part 61 Subpart M - National Emission Standard for Asbestos	DOES NOT APPLY. The CathyVal Plant does not contain any asbestos.
	NESHAP Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations	DOES NOT APPLY. The CathyVal Plant does not contain any benzene.
	NESHAP Part 63 Subpart A - General Provisions.	DOES NOT APPLY. Rhodia is not a major source of HAPs.
	NESHAP Part 63 Subpart FFFF - National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing	DOES NOT APPLY. Rhodia is not a major source of HAPs.
	NESHAP Part 64 - Compliance Assurance Monitoring	DOES NOT APPLY. No emission sources emit the major threshold amount of any pollutant.
	LAC 33:III Chapter 21, Subchapter L - Limiting Volatile Organic Compound Emissions from Cleanup Solvent Processing	DOES NOT APPLY. Rhodia does not have any affected cleaning operations according to the definition because the plant does not use solvents with vapor pressure >1.5 psia for cleaning operations.

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XI. Table 2. Explanation for Exemption Status or Non-applicability of a Source		
UNF001 Facility (cont'd)	LAC 33:III Chapter 51 - Comprehensive Toxic Air Pollution Emissions Control Program [LAC 33:III.5109.A]	DOES NOT APPLY. The CathyVal plant does not emit any class I or class II TAPs for which sitewide emissions exceed the MER.
EQT009, EQT015 Tank Farm Scrubbers	LAC 33:III Chapter 21 - VOC Loading	DOES NOT APPLY. The maximum true vapor pressure of the VOCs loaded is less than 1.5 psia.
	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMi Reactor Processes and Distillation Operations	DOES NOT APPLY. Vanessa does not produce any products on the list of SOCMi chemicals provided in LAC 33:III.Chapter 21.Appendix A.
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Vanessa is not a batch process.
EQT010, EQT011, EQT012, EQT013, EQT020, EQT022, EQT023, EQT025, EQT026, EQT029, EQT038, EQT041, EQT042, EQT044, EQT054, EQT055, EQT058 - EQT059, EQT61 - EQT68, EQT070, EQT071, EQT073, EQT074, EQT261 Tanks	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.
EQT019, EQT021, EQT028, EQT031, EQT040, EQT045 Scrubbers	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMi Reactor Processes and Distillation Operations	DOES NOT APPLY. Vanessa does not produce any products on the list of SOCMi chemicals provided in LAC 33:III.Chapter 21.Appendix A.
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Vanessa is not a batch process.
EQT016 Storage Tank	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.

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XI. Table 2. Explanation for Exemption Status or Non-applicability of a Source		
EQT16 Storage Tank (cont'd)	40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY. Vapor pressure is less than 0.51 psia.
EQT017, EQT018 Storage Tanks	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.
	40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY. Capacity is less than 39,900 gallons and vapor pressure is less than 2.2 psia.
EQT024, EQT027, EQT035, EQT039, EQT043, EQT046, EQT048, EQT049, EQT077-EQT081, EQT083, EQT088, EQT090 - EQT093, EQT095, EQT096, EQT098-EQT105, EQT137, EQT188 - EQT 207, EQT209 - EQT 216, EQT218 - EQT232, EQT254, EQT256	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT. Emits less than 100 lb VOC in a 24-hour period.
EQT051	LAC 33:III Chapter 13 - Emissions Standards for Particulate Matter - Opacity Limits [LAC 33.III.1311.C]	EXEMPT. PM ₁₀ emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. [LAC33.III.1311.E]
EQT139 High Purity PC Mixing Vessel	LAC 33:III Chapter 21 - VOC Loading	DOES NOT APPLY. The maximum true vapor pressure of the VOCs loaded is less than 1.5 psia.
	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT. Emits less than 100 lb VOC in a 24-hour period.
EQT030, EQT053 Tanks	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.
	40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY. Capacity is less than 39,900 gallons and vapor pressure is less than 2.2 psia.

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XI. Table 2. Explanation for Exemption Status or Non-applicability of a Source		
EQT052 Tank Farm Scrubber	LAC 33:III Chapter 21 - VOC Loading	DOES NOT APPLY. The maximum true vapor pressure of the VOCs loaded is less than 1.5 psia.
	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMR Reactor Processes and Distillation Operations	DOES NOT APPLY. Daphne does not produce any products on the list of SOCMR chemicals provided in LAC 33:III Chapter 21, Appendix A.
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Although some sections of the Daphne unit are batch operated, there are no batch process vents routed to this scrubber.
EQT056 Vent Scrubber	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMR Reactor Processes and Distillation Operations	DOES NOT APPLY. Daphne does not produce any products on the list of SOCMR chemicals provided in LAC 33:III Chapter 21, Appendix A.
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT. No control is required for the batch process vents venting to the scrubber because the pool of non-exempt batch process vents from the Daphne unit is controlled with overall 90% efficiency utilizing other control equipment.
EQT069, EQT072, EQT236, EQT237, EQT238 Tanks	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT. Mass annual emission is less than 500 lb/yr. [LAC 33:III.2149.A.2.b]
EQT075 Baghouse	LAC 33:III Chapter 13 - Emissions Standards for Particulate Matter - Opacity Limits [LAC 33:III.1311.C]	EXEMPT. PM ₁₀ emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. [LAC33.III.1311.E]
EQT076 Vent Scrubber	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMR Reactor Processes and Distillation Operations	DOES NOT APPLY. If it can be demonstrated that a TRE index value is greater than 1.0 prior to the use of a recovery device, then such recovery device is not subject to the requirements of this Subchapter.
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Cathy is not a batch process. [LAC 33:III.2149]
EQT082 Tank Farm Scrubber	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMR Reactor Processes and Distillation Operations	DOES NOT APPLY. There are no distillation or reactor vents routed to this scrubber. [LAC 33:III.2147.A]
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Cathy is not a batch process. [LAC 33:III.2149]
EQT084 - EQT086	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.

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XI. Table 2. Explanation for Exemption Status or Non-applicability of a Source		
EQT084 – EQT086 Tanks (cont'd)	40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY. Vapor pressure is less than 0.51 psia.
EQT089 Vent Scrubber	LAC 33:III Chapter 21 Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Cathy is not a batch process. [LAC 33:III.2149]
EQT094 Vent Scrubber	LAC 33:III Chapter 21 Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY. If it can be demonstrated that a TRE index value is greater than 1.0 prior to the use of a recovery device, then such recovery device is not subject to the requirements of this Subchapter.
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Cathy is not a batch process. [LAC 33:III.2149]
EQT097 Seal Pot	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY. There are no distillation or reactor vents routed to this scrubber. [LAC 33:III.2147.A]
	LAC 33:III Chapter 21 Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Cathy is not a batch process. [LAC 33:III.2149]
EQT106, EQT107, EQT109, EQT110, EQT111, EQT112, EQT115, EQT116 Baghouses	LAC 33:III Chapter 13 - Emissions Standards for Particulate Matter - Opacity Limits [LAC 33:III.1311.C]	EXEMPT. PM ₁₀ emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. [LAC33.III.1311.E]
EQT113, EQT114 Heaters	LAC 33:III Chapter 15 - Emission Standards for Sulfur Dioxide	EXEMPT. Emissions from this unit are less than 250 tpy; therefore, Rhodia requests exemption from this requirement per LAC 33:III.1503.C.
FUG004 Cathy Fugitives	40 CFR 60 Subpart VV - Standards of Performance for SOCMI Equipment Leaks of VOC	EXEMPT. If an affected facility produces heavy liquid chemicals only from heavy liquid feed of raw materials, then it is exempt from 40 CFR 60.482-1 through 40 CFR 60.482-10. [40 CFR 60.480(d)(3)]
FUG005 Daphne Fugitives	40 CFR 60 Subpart VV - Standards of Performance for SOCMI Equipment Leaks of VOC	DOES NOT APPLY. No chemicals listed in 40 CFR 60.489 are produced as intermediates or final products at the Daphne unit. [40 CFR 60.480]
FUG001 Vanessa Fugitives	40 CFR 60 Subpart VV - Standards of Performance for SOCMI Equipment Leaks of VOC	DOES NOT APPLY. No chemicals listed in 40 CFR 60.489 are produced as intermediates or final products at the Vanessa unit. [40 CFR 60.480]
EQT125 Cooling Towers	LAC 33:III Chapter 13 - Emissions Standards for Particulate Matter - Opacity Limits [LAC 33:III.1311.C]	EXEMPT. PM ₁₀ emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. [LAC33.III.1311.E]

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CATHYVAL Plant

Agency Interest No.: 1314

Rhodia Inc.

Baton Rouge, East Baton Rouge Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-applicability of a Source		
EQT126 CATHYVAL Sumps	LAC 33:III Chapter 21 Subchapter M - Limiting VOC Emissions from Industrial Wastewater	EXEMPT. Any affected plant with an annual VOC loading in wastewater <10 Mg (11.03 tons) shall be exempt from the control requirements of Subsection B. [LAC 33:III.2153.G.1].
GRP014 Wastewater Treatment	LAC 33:III Chapter 21 Subchapter M - Limiting VOC Emissions from Industrial Wastewater	EXEMPT. Any affected plant with an annual VOC loading in wastewater <10 Mg (11.03 tons) shall be exempt from the control requirements of Subsection B. [LAC 33:III.2153.G.1]
EQT128 RAG layer Diverting Tank	LAC 33:III Chapter 21 Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT. Mass annual emission is less than 500 lb/yr. [LAC 33:III.2149.A.2.b]

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

General Information
AI ID: 1314 Rhodia Inc
Activity Number: PER20100003
Permit Number: 2184-V2
Air - Title V Regular Permit Renewal

Also Known As:

ID	Name	User Group	Start Date
0840-00033	Rhodia Inc	CDS Number	08-05-2002
LAD008161234	Rhodia Inc	Hazardous Waste Notification	11-17-1980
PMT/PC	GPRA Baselines	Hazardous Waste Permitting	10-01-1997
00861	Rhone Poulenc Basic Chemical Co	Inactive & Abandoned Sites	11-23-1999
LAD008161234	Stauffer Chemical Co Baton Rouge	Inactive & Abandoned Sites	11-23-1999
LA0005223	LPDES #	LPDES Permit #	05-22-2003
	Priority 1 Emergency Site	Priority 1 Emergency Site	07-18-2006
GL-349	Radiation General License	Radiation License Number	12-14-2000
LA-338A-N01	Radioactive Material License	Radiation License Number	12-14-2000
G-033-3198	Site ID #	Solid Waste Facility No.	11-21-1999
22318	Rhone Poulenc Basic Chemical Co Baton Rouge	TEMPO Merge	01-07-2002
38329	Stauffer Chemical	TEMPO Merge	11-19-2001
38427	Rhodia Inc	TEMPO Merge	01-11-2001
70821STFFRAIRLI	TRI #	Toxic Release Inventory	07-19-2004

Physical Location:

1275 Airline Hwy
Baton Rouge, LA 70805

Main FAX: 2253593722
Main Phone: 2253593481

Mailing Address:

1275 Airline Hwy
Baton Rouge, LA 70805

Location of Front Gate:

30.509861 latitude, -91.18465 longitude, Coordinate Method: Lat.\Long. - DMS, Coordinate Datum: NAD83

Related People:

Name	Mailing Address	Phone (Type)	Relationship
S. B. "Bala" Balachandran	PO Box 828 Baton Rouge, LA 708210828	2253593443 (WF)	Accident Prevention Contact for
S. B. "Bala" Balachandran	PO Box 828 Baton Rouge, LA 708210828	2253593742 (WP)	Accident Prevention Contact for
Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Radiation Contact For
Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Radiation License Billing Party for
Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Water Billing Party for
Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Haz. Waste Billing Party for
J. Marcus Lewis	PO Box 828 Baton Rouge, LA 708210828	2253567111 (WP)	Responsible Official for
John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Air Permit Contact For
John Richardson	PO Box 828 Baton Rouge, LA 70821	JOHN.RICHARDSOI	Air Permit Contact For
John Richardson	PO Box 828 Baton Rouge, LA 70821	JOHN.RICHARDSOI	Accident Prevention Billing Party for
John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Accident Prevention Billing Party for
John Richardson	PO Box 828 Baton Rouge, LA 70821	JOHN.RICHARDSOI	Emission Inventory Facility Contact for
John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Emission Inventory Facility Contact for

General Information
AI ID: 1314 Rhodia Inc
Activity Number: PER20100003
Permit Number: 2184-V2
Air - Title V Regular Permit Renewal

Related Organizations:	Name	Address	Phone (Type)	Relationship
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Operates
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Owns
	Rhodia Inc	c/o CT Corporation System Baton Rouge, LA 70808		Agent of Service for
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Emission Inventory Billing Party
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Air Billing Party for

NAIC Codes: 325188, All Other Basic Inorganic Chemical Manufacturing

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Ms. Tommie Milam, Permit Support Services Division, at (225) 219-3259 or email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 1314 - Rhodia Inc
Activity Number: PER20100003
Permit Number: 2184-V2
Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Cathyval Plant						
EQT 0009	101 - 101, LIGHTS TANK FARM SCRUBBER C-165					8760 hr/yr
EQT 0010	D-148 - D-148, VANILLIN SOLVENT 1 TANK (MIBK STORAGE) D-148	9120 gallons	11.08 MM gallons/yr	5.54 MM gallons/yr	VANILLIN SOLVENT 1 TANK (MIBK STORAGE)	8760 hr/yr
EQT 0011	D-149 - D-149, ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)	9120 gallons	11.08 MM gallons/yr	5.54 MM gallons/yr	MIBK STORAGE	8760 hr/yr
EQT 0012	D-152 - D-152, SOLVENT 2 TANK (MIBK STORAGE) D-152	15400 gallons	19.3 MM gallons/yr	9.65 MM gallons/yr	MIBK STORAGE	8760 hr/yr
EQT 0013	D-153 - D-153, SOLVENT 2 TANK (MIBK STORAGE) D-153	15400 gallons	19.3 MM gallons/yr	9.65 MM gallons/yr	MIBK STORAGE	8760 hr/yr
EQT 0014	D-169 - D-169, SOLVENT 3 TANK (METHANOL STORAGE) D-169	11200 gallons	5.08 MM gallons/yr	5.08 MM gallons/yr	METHANOL / ETHANOL	8760 hr/yr
EQT 0015	102 - 102, HEAVIES TANK FARM SCRUBBER C-187					8760 hr/yr
EQT 0016	D-107 (Vanessa) - D-107 (Vanessa), GUAIACOL STORAGE TANK D-107	45685 gallons	1.68 MM gallons/yr	1.68 MM gallons/yr		8760 hr/yr
EQT 0017	D-111 (Vanessa) - D-111 (Vanessa), GUETOL STORAGE TANK D-111	31725 gallons	1.57 MM gallons/yr	1.57 MM gallons/yr		8760 hr/yr
EQT 0018	D-113 (Vanessa) - D-113 (Vanessa), GLYOXYLIC ACID STORAGE TANK D-113	31725 gallons				8760 hr/yr
EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201					8760 hr/yr
EQT 0020	C-216 - C-216, GUAIACOL RECYCLE TANK C-216	780 gallons				8760 hr/yr
EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248					8760 hr/yr
EQT 0022	C-236 - C-236, NEUTRALIZATION SURGE TANK C-236	1587 gallons				8760 hr/yr
EQT 0023	C-240 - C-240, EXTRACTOR TAILS UPSET TANK C-240	2570 gallons				8760 hr/yr
EQT 0024	C-243 - C-243, EXTRACTOR 1 TAILS SAFETY DECANter C-243	900 gallons				8760 hr/yr
EQT 0025	C-244 - C-244, MANDELATE SURGE TANK C-244	2570 gallons				8760 hr/yr
EQT 0026	C-249 - C-249, SOLVENT 1 SURGE TANK C-249	1600 gallons				8760 hr/yr
EQT 0027	C-247 - C-247, SOLVENT 1 WASHING SAFETY DECANter C-247	225 gallons				8760 hr/yr
EQT 0028	105 - 105, OXIDATION SCRUBBER C-419					8760 hr/yr
EQT 0029	C-409 - C-409, MANDELATE SURGE TANK C-409	2575 gallons				8760 hr/yr
EQT 0030	C-417 - D-417, OXIDATION SURGE TANK D-417	22000 gallons				8760 hr/yr
EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427					8760 hr/yr
EQT 0032	C-421 - C-421, SOLVENT 2 SURGE TANK C-421	1785 gallons				8760 hr/yr
EQT 0033	C-430 - C-430, SOLVENT 2 DECANter C-430	2000 gallons				8760 hr/yr
EQT 0034	C-432 - C-432, EXTRACTION 2 DRAIN TANK C-432	8000 gallons				8760 hr/yr
EQT 0035	C-434 - C-434, EXTRACTION 2 TAILS SAFETY DECANter C-434	1400 gallons				8760 hr/yr
EQT 0036	C-441 - C-441, AQUEOUS PHASE SURGE TANK C-441	4100 gallons				8760 hr/yr
EQT 0037	C-501 - C-501, SOLVENT 2 DISTILLATION SURGE TANK C-501	8095 gallons				8760 hr/yr
EQT 0038	C-558 - C-558, AQUEOUS EFFLUENTS TANK C-558	2700 gallons				8760 hr/yr
EQT 0039	C-575 - C-575, SOLVENT 2 RECOVERY DECANter C-575	70 gallons				8760 hr/yr

INVENTORIES

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Cathyval Plant						
EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557					8760 hr/yr
EQT 0041	C-535 - C-535, TARS SURGE TANK C-535	2885 gallons				8760 hr/yr
EQT 0042	C-616 - C-616, FLAKER SURGE TANK C-616	3870 gallons				8760 hr/yr
EQT 0043	C-648 - C-648, RECYCLE PRODUCT HOPPER MELTER C-648	1060 gallons				8760 hr/yr
EQT 0044	C-655 - C-655, MELTER SURGE TANK C-655	1735 gallons				8760 hr/yr
EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624					8760 hr/yr
EQT 0046	C-541 - C-541, METHANOL WASHING DRUM C-541 (Vents through C-801)	600 gallons				8760 hr/yr
EQT 0047	C-801 - C-801, SOLVENT 3 RECOVERY FEED TANK C-801	6000 gallons				8760 hr/yr
EQT 0048	C-603 - C-603, DISOLVER C-603	2300 gallons				8760 hr/yr
EQT 0049	C-606 - C-606, VACUUM CRYSTALLIZER C-606	3710 gallons				8760 hr/yr
EQT 0050	C-617 - C-617, CENTRIFUGE SURGE TANK C-617	2385 gallons				8760 hr/yr
EQT 0051	109 - 109, BAGHOUSE FILTER/SCRUBBER C-704					8760 hr/yr
EQT 0052	201 - 201, TANK FARM SCRUBBER C-146					8760 hr/yr
EQT 0053	D-111 (Daphne) - D-111 (Daphne), PYROCATECHOL STORAGE TANK	27165 gallons	1.74 MM gallons/yr	1.74 MM gallons/yr	PYROCATECHOL	8760 hr/yr
EQT 0054	D-128 - D-128, TARS STORAGE TANK D-128	7050 gallons	1 MM gallons/yr	1 MM gallons/yr	TARS	8760 hr/yr
EQT 0055	D-141 - D-141, VERATROLE STORAGE TANK D-141	5825 gallons	.21 MM gallons/yr	.21 MM gallons/yr	VERATROL	8760 hr/yr
EQT 0056	202 - 202, VENT SCRUBBER C-685					8760 hr/yr
EQT 0057	C-201 - C-201, PC DISSOLUTION TANK C-201	4750 gallons				8760 hr/yr
EQT 0058	C-553 - C-553, GUAIACOL DISTILLATION FEED TANK C-553	8000 gallons				8760 hr/yr
EQT 0059	C-561 - C-561, RECYCLE PROCESS WATER TANK C-561	3100 gallons				8760 hr/yr
EQT 0060	C-603 - C-603, GUAIACOL DISTILLATION KETTLE C-603	8800 gallons				8760 hr/yr
EQT 0061	C-615 - C-615, TARS RECEIVER C-615	1150 gallons				8760 hr/yr
EQT 0062	C-645 - C-645, PMDB RECEIVER C-645	2500 gallons				8760 hr/yr
EQT 0063	C-651 - C-651, PC RECEIVER C-651	2100 gallons				8760 hr/yr
EQT 0064	C-655 - C-655, GUAIACOL LT. ENDS RECEIVER C-655	500 gallons				8760 hr/yr
EQT 0065	C-660 - C-660, INTERS./VERATROLE RECEIVER C-660	1325 gallons				8760 hr/yr
EQT 0066	C-665 - C-665, SECOND RECEIVER C-665	750 gallons				8760 hr/yr
EQT 0067	C-670 - C-670, END OF CAMPAIGN RECEIVER C-670	1300 gallons				8760 hr/yr
EQT 0068	C-675 - C-675, GUAIACOL RECEIVER C-675	5227 gallons				8760 hr/yr
EQT 0069	C-701 - C-701, CRUDE VERATROLE WASH TANK C-701	1550 gallons				8760 hr/yr
EQT 0070	C-705 - C-705, WATER GUAIACOLATE RECEIVER C-705	1325 gallons				8760 hr/yr
EQT 0071	C-710 - C-710, CAUSTIC WASH RECEIVER C-710	897 gallons				8760 hr/yr
EQT 0072	C-751 - C-751, VERATROLE DISTILLATION KETTLE C-751	980 gallons				8760 hr/yr
EQT 0073	C-765 - C-765, LT. ENDS RECEIVER C-765	110 gallons				8760 hr/yr
EQT 0074	C-770 - C-770, DISTILLED VERATROLE RECEIVER C-770	800 gallons				8760 hr/yr
EQT 0075	203 - 203, BAGHOUSE FOR HQ HANDLING					8760 hr/yr

INVENTORIES

AI ID: 1314 - Rhodia Inc
Activity Number: PER20100003
Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Cathyval Plant						
EQT 0076	301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)					8760 hr/yr
EQT 0077	C-223 - C-223, PHENOL DRAIN TANK REACTION SURGE DRUM C-223	765 gallons				8760 hr/yr
EQT 0078	C-416 - C-416, PREDEPHENOL REFLUX DRUM C-416	2937 gallons				8760 hr/yr
EQT 0079	C-508 - C-508, VERTICAL TAR DILUTER C-508	264 gallons				8760 hr/yr
EQT 0080	C-530 - C-530, DISTILLATION DRAN TANK C-530	761 gallons				8760 hr/yr
EQT 0081	C-532 - C-532, TAILS SURGE DRUM C-532	4635 gallons				8760 hr/yr
EQT 0082	302 - 302, OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)					8760 hr/yr
EQT 0083	C-113 - C-113, PHENOL UNLOADING TANK C-113	1000 gallons				8760 hr/yr
EQT 0084	D-107 - D-107, WASHWATER TANK D-107	88900 gallons				8760 hr/yr
EQT 0085	D-111 - D-111, PHENOL MAKE-UP TANK D-111	66100 gallons				8760 hr/yr
EQT 0086	D-115 - D-115, WASHWATER/GUAIACOL TANK D-115	42300 gallons				8760 hr/yr
EQT 0087	D-315 - D-315, RAFFINATE TANK D-315	58000 gallons				8760 hr/yr
EQT 0088	D-204 - D-204, RECYCLE PHENOL TANK D-204	18500 gallons				8760 hr/yr
EQT 0089	303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)					8760 hr/yr
EQT 0090	C-320 - C-320, IPE STORAGE TANK C-320	23978 gallons				8760 hr/yr
EQT 0091	C-308 - C-308, IPE SETTLER C-308	6780 gallons				8760 hr/yr
EQT 0092	C-311 - C-311, WASHWATER DRUM C-311	6822 gallons				8760 hr/yr
EQT 0093	C-322 - C-322, ETHER DRAIN TANK C-322	673 gallons				8760 hr/yr
EQT 0094	304 - 304, PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)					8760 hr/yr
EQT 0095	C-551 - C-551, PC RECEIVING DRUM C-551	500 gallons				8760 hr/yr
EQT 0096	C-563 - C-563, PC FLAKER FEED TANK C-563	500 gallons				8760 hr/yr
EQT 0097	306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)					8760 hr/yr
EQT 0098	C-650 - C-650, REFLUX SURGE DRUM C-650	350 gallons				8760 hr/yr
EQT 0099	D-607 - D-607, HQ DISSOLVER TANK D-607	1375 gallons				8760 hr/yr
EQT 0100	D-610 - D-610, HQ SURGE TANK D-610	7000 gallons				8760 hr/yr
EQT 0101	D-612 - D-612, CARBON TREATER TANK D-612	700 gallons				8760 hr/yr
EQT 0102	D-632 - D-632, CRYSTALLIZATION TANK D-632	1763 gallons				8760 hr/yr
EQT 0103	D-652 - D-652, MOTHER LIQUOR SURGE TANK D-652	8068 gallons				8760 hr/yr
EQT 0104	D-653 - D-653, CONC. COLUMN FEED TANK D-653	6792 gallons				8760 hr/yr
EQT 0105	D-657 - D-657, MOTHER LIQUOR SURGE DRUM D-657	85 gallons				8760 hr/yr
EQT 0106	307 - 307, SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601					8760 hr/yr
EQT 0107	308 - 308, OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)					8760 hr/yr
EQT 0109	310 - 310, CARBON BAG DUMP STATION BAGHOUSE S-					8760 hr/yr

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Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Cathyval Plant						
	615 FOR D618 (P&I.D. F601)					
EQT 0110	311 - 311, PC PACKAGING BAGHOUSE Y-731 (P&I.D. F703)					8760 hr/yr
EQT 0111	312 - 312, HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)					8760 hr/yr
EQT 0112	313 - 313, HQ REWORK DUMPER BAGHOUSE S-693 FOR D607 (P&I.D. F602)					8760 hr/yr
EQT 0113	315A - 315A, FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)		6 MM BTU/hr	6 MM BTU/hr		3024 hr/yr
EQT 0114	315B - 315B, PRIMARY FLUID HEATER F-971 (P&I.D. F925)		8 MM BTU/hr	8 MM BTU/hr		8760 hr/yr
EQT 0115	316 - 316, PRESSURE LEAF FILTER DRYING VENT Y-625					8760 hr/yr
EQT 0116	317 - 317, VACUUM CLEAN-UP PACKAGING BAGHOUSE Y-760X (P&I.D. F703)					8760 hr/yr
EQT 0118	401A - 401A, WWT TANK NO. 28 (P&I.D. F101)	600000 gallons		260 gallons/min	WASTEWATER	8760 hr/yr
EQT 0119	401B - 401B, STORMWATER TANK NO. 29 (P&I.D. F101)	1.5 million gallons		290 gallons/min	STORMWATER	8760 hr/yr
EQT 0120	401C - 401C, TANK D-197	50000 gallons		48 gallons/min	WASTEWATER	8760 hr/yr
EQT 0121	402A - 402A, WEST AERATION BASIN D210	1.53 million gallons		550 gallons/min	WASTEWATER	8760 hr/yr
EQT 0122	402B - 402B, EAST AERATION BASIN D213 (P&I.D. F201)	1.53 million gallons		550 gallons/min	WASTEWATER	8760 hr/yr
EQT 0123	402C - 402C, WEST CLARIFIER D301 (P&I.D. F302)	296200 gallons		550 gallons/min	WASTEWATER	8760 hr/yr
EQT 0124	402D - 402D, EAST CLARIFIER D304 (P&I.D. F302)	296200 gallons		550 gallons/min	WASTEWATER	8760 hr/yr
EQT 0125	M-5 - M-5, CATHY (E925) AND VANESSA (E907) COOLING TOWERS (P&I.D. F903)		19000 gallons/min	19000 gallons/min		8760 hr/yr
EQT 0126	M-6 - M-6, CATHYVAL SUMPS					8760 hr/yr
EQT 0127	C-101 - C-101, IPE SOLVENT STORAGE TANK C-101	8840 gallons				8760 hr/yr
EQT 0128	C-351 - C-351, RAG LAYER DIVERTING TANK C-351	3430 gallons				8760 hr/yr
EQT 0129	C-401 - C-401, AQUEOUS PHASE SURGE TANK C-401	6162 gallons				8760 hr/yr
EQT 0130	C-352 - C-352, RAG LAYER SURGE TANK C-352	1500 gallons				8760 hr/yr
EQT 0131	C-461 - C-461, AQUEOUS EFFLUENT TANK C-461	715 gallons				8760 hr/yr
EQT 0132	C-521 - C-521, ORGANIC PHASE SURGE TANK C-521	7070 gallons				8760 hr/yr
EQT 0133	C-132 - C-132, MeCl STORAGE TANK C-132	14340 gallons				8760 hr/yr
EQT 0134	C-136 - C-136, EtCl STORAGE TANK C-136	15400 gallons				8760 hr/yr
EQT 0135	C-301 - C-301, ACIDIFICATION/DECANTATION TANK C-301	8000 gallons				8760 hr/yr
EQT 0136	C-503 - C-503, DEETHERATION IPE DECANTER C-503	208 gallons				8760 hr/yr
EQT 0137	D-681 - D-681, SCREENER RESIDUE DISSOLVER D-681	212 gallons				8760 hr/yr
EQT 0139	110 - 110, HIGH PURITY PC MIXING VESSEL	6000 gallons	2200000 lb/yr	2200000 lb/yr		8760 hr/yr
EQT 0188	C-202 - Premixing Reactor					8760 hr/yr
EQT 0189	C-207 - Veratrole Stripper					8760 hr/yr

INVENTORIES

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Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Cathyval Plant						
EQT 0190	C-217 - No. 1 Condensation Reactor					8760 hr/yr
EQT 0191	C-219 - No. 2 Condensation Reactor	1500 gallons				8760 hr/yr
EQT 0192	C-221 - No. 3 Condensation Reactor	1500 gallons				8760 hr/yr
EQT 0193	C-223 - No. 4 Condensation Reactor	1500 gallons				8760 hr/yr
EQT 0194	C-225 - No. 5 Condensation Reactor	1500 gallons				8760 hr/yr
EQT 0195	C-227 - Polishing Reactor					8760 hr/yr
EQT 0196	C-241 - Guaiacol Extraction Column					8760 hr/yr
EQT 0197	C-245 - Solvent 1 Washing Column					8760 hr/yr
EQT 0198	C-301 - Guaiacol Recovery Column					8760 hr/yr
EQT 0199	C-306 - Guaiacol/Tars Separator					8760 hr/yr
EQT 0200	C-312 - Solvent 1 Stripper Decanter					8760 hr/yr
EQT 0201	C-314 - Solvent 1 Stripper					8760 hr/yr
EQT 0202	C-316 - Solvent 1 Cold Trap					8760 hr/yr
EQT 0203	C-320 - Guaiacol Distillation Reflux Drum					8760 hr/yr
EQT 0204	C-322X - Solvent 1 Vacuum Package Separator					8760 hr/yr
EQT 0205	H-317 - Vacuum System					8760 hr/yr
EQT 0206	C-407 - Oxidation Reactor					8760 hr/yr
EQT 0207	C-416 - Oxidation Column					8760 hr/yr
EQT 0208	C-429 - CO2 Separator					8760 hr/yr
EQT 0209	C-435 - Vanillin Extraction Column					8760 hr/yr
EQT 0210	C-441 - Solvent 2 Washing Column					8760 hr/yr
EQT 0211	C-504 - Vanillin/Solvent 2 Atm. Distillation Column					8760 hr/yr
EQT 0212	C-507 - Vanillin/Solvent 2 Vacuum Distillation Column					8760 hr/yr
EQT 0213	C-516 - Solvent 2 Cold Trap					8760 hr/yr
EQT 0214	C-533X - Solvent 2 Vacuum Package Separator					8760 hr/yr
EQT 0215	C-565 - Solvent 2 Recovery Column (Aqueous Phase Stripper)					8760 hr/yr
EQT 0216	C-568 - Solvent 2 Recovery Column (Top Rectification)					8760 hr/yr
EQT 0217	E-428 - Condenser					8760 hr/yr
EQT 0218	H-520 - Vacuum System					8760 hr/yr
EQT 0219	C-525 - Tars Removal Column					8760 hr/yr
EQT 0220	C-525 - Tars By-Pass Tank					8760 hr/yr
EQT 0221	C-545 - Lights Removal Column					8760 hr/yr
EQT 0222	C-555A/B - Vanillin Cold Traps					8760 hr/yr
EQT 0223	C-562X - Vanillin Purification Vacuum Package Separator					8760 hr/yr
EQT 0224	H-556 - Vacuum System					8760 hr/yr
EQT 0225	C-634X - Dryer Scrubber					8760 hr/yr
EQT 0226	C-637X - Crystallization Vacuum Package Separator					8760 hr/yr
EQT 0227	C-640 - Dryer					8760 hr/yr

INVENTORIES

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Cathyval Plant						
EQT 0228	C-805 - Solvent 3 Recovery Column					8760 hr/yr
EQT 0229	H-619 - Vacuum System					8760 hr/yr
EQT 0230	Y-620 - Centrifuge A					8760 hr/yr
EQT 0231	Y-621 - Centrifuge B					8760 hr/yr
EQT 0232	Y-640 - Dryer					8760 hr/yr
EQT 0233	C-606 - Guaiacol Distillation Column					8760 hr/yr
EQT 0234	C-683X - Guaiacol Vacuum Package Separator					8760 hr/yr
EQT 0235	C-687A/B - Guaiacol Distillation Cold Traps					8760 hr/yr
EQT 0236	C-754 - Veratrole Distillation Column	450 gallons				8760 hr/yr
EQT 0237	C-783X - Veratrole Vacuum Separator					8760 hr/yr
EQT 0238	C-787 - Veratrole Distillation Cold Traps					8760 hr/yr
EQT 0239	C-213 - First Reactor					8760 hr/yr
EQT 0240	C-215 - Second Reactor					8760 hr/yr
EQT 0241	C-217 - Third Reactor					8760 hr/yr
EQT 0242	C-219 - Fourth Reactor					8760 hr/yr
EQT 0243	C-231 - Fifth Reactor					8760 hr/yr
EQT 0244	C-501 - Detarring Column					8760 hr/yr
EQT 0245	C-521 - Final Dephenoling Column					8760 hr/yr
EQT 0246	E-418 - Phenol Condenser					8760 hr/yr
EQT 0247	H-524 - Vacuum System					8760 hr/yr
EQT 0248	C-301 - Water Stripper					8760 hr/yr
EQT 0249	C-313 - Extraction Column					8760 hr/yr
EQT 0250	C-405 - Dehydration Column					8760 hr/yr
EQT 0251	E-401 - Solvent Vent Condenser					8760 hr/yr
EQT 0252	C-536 - Splitter Column (PC/HQ Separation)					8760 hr/yr
EQT 0253	H-545 - Vacuum System					8760 hr/yr
EQT 0254	S-560 - PC Flaker					8760 hr/yr
EQT 0255	C-251 - Batch Reactor					8760 hr/yr
EQT 0256	H-640 - Vacuum System for Crystallizers					8760 hr/yr
EQT 0257	C-451 - Extraction Column					8760 hr/yr
EQT 0258	C-501 - Detheration Column					8760 hr/yr
EQT 0259	C-511 - Detheration Guaiacol Decanter					8760 hr/yr
EQT 0260	C-551 - Crude Guaiacol Dehydration Column					8760 hr/yr
EQT 0261	C-555 - Wet Guaiacol Tank					8760 hr/yr
EQT 0286	M-8A - Fire-Water Pump G972A		370 horsepower	370 horsepower		100 hr/yr
EQT 0287	M-8B - Fire-Water Pump G972B		370 horsepower	370 horsepower		100 hr/yr
EQT 0288	M-9 - Emergency Diesel Generator for Daphne/Vanessa Sump		500 horsepower	222 horsepower		400 hr/yr
EQT 0289	E-318 - Predephenoling Vent Condenser					8760 hr/yr

INVENTORIES

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Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Cathyval Plant						
EQT 0290	E-506 - Detarring Condenser					8760 hr/yr
FUG 0001	F-6V - F-6V, VANESSA FUGITIVE EMISSIONS					8760 hr/yr
FUG 0004	F-6C - F-6C, CATHY FUGITIVE EMISSIONS					8760 hr/yr
FUG 0005	F-6D - F-6D, DAPHNE FUGITIVE EMISSIONS					8760 hr/yr

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Cathyval Plant							
EQT 0009	101 - 101, LIGHTS TANK FARM SCRUBBER C-165	7.5	22.1	.25		70	86
EQT 0015	102 - 102, HEAVIES TANK FARM SCRUBBER C-187	7.5	159	.67		8	86
EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201	5.4	15.9	.25		88	86
EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248	5.5	16.2	.25		70	86
EQT 0028	105 - 105, OXIDATION SCRUBBER C-419	29.8	970	.83		70	86
EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427	30.4	90	.25		70	86
EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557	1.6	8.2	.33		70	86
EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624	5.6	16.5	.25		88	86
EQT 0051	109 - 109, BAGHOUSE FILTER/SCRUBBER C-704	75	7952	1.5		88	75
EQT 0052	201 - 201, TANK FARM SCRUBBER C-146	5.4	15.9	.25		30	75
EQT 0056	202 - 202, VENT SCRUBBER C-685	75.4	387	.33		85	75
EQT 0075	203 - 203, BAGHOUSE FOR HQ HANDLING	37	435.9	.5		60	
EQT 0076	301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)	9.45	28	.25		35	75
EQT 0082	302 - 302, OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)	20.7	61	.25		32	75
EQT 0089	303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)	7.5	22.1	.25		35	75
EQT 0094	304 - 304, PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)	2.7	7.95	.25		35	75
EQT 0097	306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)	1.97	10.1	.33		70	75
EQT 0106	307 - 307, SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601	34	400	.5		23	
EQT 0107	308 - 308, OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)	34	400	.5		23	
EQT 0109	310 - 310, CARBON BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)	34	400	.5		23	
EQT 0110	311 - 311, PC PACKAGING BAGHOUSE Y-731 (P&I.D. F703)	42.5	500	.5		59	75
EQT 0111	312 - 312, HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)	42.5	500	.5		59	75
EQT 0112	313 - 313, HQ REWORK DUMPER BAGHOUSE S-693 FOR D607 (P&I.D.	34	400	.5		59	75

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Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Cathyval Plant							
F602)							
EQT 0113	315A - 315A, FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)	44.2	2085	1		40	700
EQT 0114	315B - 315B, PRIMARY FLUID HEATER F-971 (P&I.D. F925)	28.6	3760	1.67		15.8	735
EQT 0115	316 - 316, PRESSURE LEAF FILTER DRYING VENT Y-625	283	1452	.33		70	
EQT 0116	317 - 317, VACUUM CLEAN-UP PACKAGING BAGHOUSE Y-760X (P&I.D. F703)	7.64	360	1		60	75
EQT 0118	401A - 401A, WWT TANK NO. 28 (P&I.D. F101)					45.5	
EQT 0119	401B - 401B, STORMWATER TANK NO. 29 (P&I.D. F101)					43.5	
EQT 0121	402A - 402A, WEST AERATION BASIN D210					20	
EQT 0122	402B - 402B, EAST AERATION BASIN D213 (P&I.D. F201)					20	
EQT 0123	402C - 402C, WEST CLARIFIER D301 (P&I.D. F302)					14	
EQT 0124	402D - 402D, EAST CLARIFIER D304 (P&I.D. F302)					14	
EQT 0125	M-5 - M-5, CATHY (E925) AND VANESSA (E907) COOLING TOWERS (P&I.D. F903)						
EQT 0126	M-6 - M-6, CATHYVAL SUMPS						
EQT 0139	110 - 110, HIGH PURITY PC MIXING VESSEL	61	20	.08		32	120
FUG 0001	F-6V - F-6V, VANESSA FUGITIVE EMISSIONS						
FUG 0004	F-6C - F-6C, CATHY FUGITIVE EMISSIONS						
FUG 0005	F-6D - F-6D, DAPHNE FUGITIVE EMISSIONS						
GRP 0014	WWT - EMISSIONS CAP - WW TREATMENT PLANT						

Relationships:

ID	Description	Relationship	ID	Description
EQT 0010	D-148 - D-148, VANILLIN SOLVENT 1 TANK (MIBK STORAGE) D-148	Controlled by	EQT 0009	101 - 101, LIGHTS TANK FARM SCRUBBER C-165
EQT 0011	D-149 - D-149, ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)	Controlled by	EQT 0009	101 - 101, LIGHTS TANK FARM SCRUBBER C-165
EQT 0012	D-152 - D-152, SOLVENT 2 TANK (MIBK STORAGE) D-152	Controlled by	EQT 0009	101 - 101, LIGHTS TANK FARM SCRUBBER C-165
EQT 0013	D-153 - D-153, SOLVENT 2 TANK (MIBK STORAGE) D-153	Controlled by	EQT 0009	101 - 101, LIGHTS TANK FARM SCRUBBER C-165
EQT 0014	D-169 - D-169, SOLVENT 3 TANK (METHANOL STORAGE) D-169	Controlled by	EQT 0009	101 - 101, LIGHTS TANK FARM SCRUBBER C-165
EQT 0016	D-107 (Vanessa) - D-107 (Vanessa), GUAIACOL STORAGE TANK D-107	Controlled by	EQT 0015	102 - 102, HEAVIES TANK FARM SCRUBBER C-187
EQT 0017	D-111 (Vanessa) - D-111 (Vanessa), GUETOL STORAGE TANK D-111	Controlled by	EQT 0015	102 - 102, HEAVIES TANK FARM SCRUBBER C-187
EQT 0018	D-113 (Vanessa) - D-113 (Vanessa), GLYOXYLIC ACID STORAGE TANK D-113	Controlled by	EQT 0015	102 - 102, HEAVIES TANK FARM SCRUBBER C-187
EQT 0020	C-216 - C-216, GUAIACOL RECYCLE TANK C-216	Controlled by	EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201

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Relationships:

ID	Description	Relationship	ID	Description
EQT 0022	C-236 - C-236, NEUTRALIZATION SURGE TANK C-236	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0023	C-240 - C-240, EXTRACTOR TAILS UPSET TANK C-240	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0024	C-243 - C-243, EXTRACTOR 1 TAILS SAFETY DECANter C-243	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0025	C-244 - C-244, MANDELATE SURGE TANK C-244	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0026	C-249 - C-249, SOLVENT 1 SURGE TANK C-249	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0027	C-247 - C-247, SOLVENT 1 WASHING SAFETY DECANter C-247	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0029	C-409 - C-409, MANDELATE SURGE TANK C-409	Controlled by	EQT 0028	105 - 105, OXIDATION SCRUBBER C-419
EQT 0030	C-417 - D-417, OXIDATION SURGE TANK D-417	Controlled by	EQT 0028	105 - 105, OXIDATION SCRUBBER C-419
EQT 0032	C-421 - C-421, SOLVENT 2 SURGE TANK C-421	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0033	C-430 - C-430, SOLVENT 2 DECANter C-430	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0034	C-432 - C-432, EXTRACTION 2 DRAIN TANK C-432	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0035	C-434 - C-434, EXTRACTION 2 TAILS SAFETY DECANter C-434	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0036	C-441 - C-441, AQUEOUS PHASE SURGE TANK C-441	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0037	C-501 - C-501, SOLVENT 2 DISTILLATION SURGE TANK C-501	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0038	C-558 - C-558, AQUEOUS EFFLUENTS TANK C-558	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0039	C-575 - C-575, SOLVENT 2 RECOVERY DECANter C-575	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0041	C-535 - C-535, TARS SURGE TANK C-535	Controlled by	EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557
EQT 0042	C-616 - C-616, FLAKER SURGE TANK C-616	Controlled by	EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557
EQT 0043	C-648 - C-648, RECYCLE PRODUCT HOPPER MELTER C-648	Controlled by	EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557
EQT 0044	C-655 - C-655, MELTER SURGE TANK C-655	Controlled by	EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557
EQT 0046	C-541 - C-541, METHANOL WASHING DRUM C-541 (Vents through C-801)	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0047	C-801 - C-801, SOLVENT 3 RECOVERY FEED TANK C-801	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0048	C-603 - C-603, DISOLVER C-603	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0049	C-606 - C-606, VACUUM CRYSTALLIZER C-606	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0050	C-617 - C-617, CENTRIFUGE SURGE TANK C-617	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0053	D-111 (Daphne) - D-111 (Daphne), PYROCATeCHOL STORAGE TANK	Controlled by	EQT 0052	201 - 201, TANK FARM SCRUBBER C-146
EQT 0054	D-128 - D-128, TARS STORAGE TANK D-128	Controlled by	EQT 0052	201 - 201, TANK FARM SCRUBBER C-146
EQT 0055	D-141 - D-141, VERATROLE STORAGE TANK D-141	Controlled by	EQT 0052	201 - 201, TANK FARM SCRUBBER C-146
EQT 0057	C-201 - C-201, PC DISSOLUTION TANK C-201	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0058	C-553 - C-553, GUAIACOL DISTILLATION FEED TANK C-553	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0059	C-561 - C-561, RECYCLE PROCESS WATER TANK C-561	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0060	C-603 - C-603, GUAIACOL DISTILLATION KETTLE C-603	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0061	C-615 - C-615, TARS RECEIVER C-615	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0062	C-645 - C-645, PMDB RECEIVER C-645	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0063	C-651 - C-651, PC RECEIVER C-651	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685

INVENTORIES

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Relationships:

ID	Description	Relationship	ID	Description
EQT 0064	C-655 - C-655, GUAIACOL LT. ENDS RECEIVER C-655	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0065	C-660 - C-660, INTERS./VERATROLE RECEIVER C-660	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0066	C-665 - C-665, SECOND RECEIVER C-665	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0067	C-670 - C-670, END OF CAMPAIGN RECEIVER C-670	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0068	C-675 - C-675, GUAIACOL RECEIVER C-675	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0069	C-701 - C-701, CRUDE VERATROLE WASH TANK C-701	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0070	C-705 - C-705, WATER GUAIACOLATE RECEIVER C-705	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0071	C-710 - C-710, CAUSTIC WASH RECEIVER C-710	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0072	C-751 - C-751, VERATROLE DISTILLATION KETTLE C-751	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0073	C-765 - C-765, LT. ENDS RECEIVER C-765	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0074	C-770 - C-770, DISTILLED VERATROLE RECEIVER C-770	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0077	C-223 - C-223, PHENOL DRAIN TANK REACTION SURGE DRUM C-223	Controlled by	EQT 0076	301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0078	C-416 - C-416, PREDEPHENOL REFLUX DRUM C-416	Controlled by	EQT 0076	301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0079	C-508 - C-508, VERTICAL TAR DILUTER C-508	Controlled by	EQT 0076	301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0080	C-530 - C-530, DISTILLATION DRAN TANK C-530	Controlled by	EQT 0076	301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0081	C-532 - C-532, TAILS SURGE DRUM C-532	Controlled by	EQT 0076	301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0083	C-113 - C-113, PHENOL UNLOADING TANK C-113	Controlled by	EQT 0082	302 - 302, OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0084	D-107 - D-107, WASHWATER TANK D-107	Controlled by	EQT 0082	302 - 302, OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0085	D-111 - D-111, PHENOL MAKE-UP TANK D-111	Controlled by	EQT 0082	302 - 302, OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0086	D-115 - D-115, WASHWATER/GUAIACOL TANK D-115	Controlled by	EQT 0082	302 - 302, OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0087	D-315 - D-315, RAFFINATE TANK D-315	Controlled by	EQT 0082	302 - 302, OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0088	D-204 - D-204, RECYCLE PHENOL TANK D-204	Controlled by	EQT 0082	302 - 302, OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0090	C-320 - C-320, IPE STORAGE TANK C-320	Controlled by	EQT 0089	303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0091	C-308 - C-308, IPE SETTLER C-308	Controlled by	EQT 0089	303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0092	C-311 - C-311, WASHWATER DRUM C-311	Controlled by	EQT 0089	303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0093	C-322 - C-322, ETHER DRAIN TANK C-322	Controlled by	EQT 0089	303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0095	C-551 - C-551, PC RECEIVING DRUM C-551	Controlled by	EQT 0094	304 - 304, PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)
EQT 0096	C-563 - C-563, PC FLAKER FEED TANK C-563	Controlled by	EQT 0094	304 - 304, PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)
EQT 0098	C-650 - C-650, REFLUX SURGE DRUM C-650	Controlled by	EQT 0097	306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0099	D-607 - D-607, HQ DISSOLVER TANK D-607	Controlled by	EQT 0097	306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)

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Relationships:

ID	Description	Relationship	ID	Description
EQT 0100	D-610 - D-610, HQ SURGE TANK D-610	Controlled by	EQT 0097	306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0101	D-612 - D-612, CARBON TREATER TANK D-612	Controlled by	EQT 0097	306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0102	D-632 - D-632, CRYSTALLIZATION TANK D-632	Controlled by	EQT 0097	306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0103	D-652 - D-652, MOTHER LIQUOR SURGE TANK D-652	Controlled by	EQT 0097	306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0104	D-653 - D-653, CONC. COLUMN FEED TANK D-653	Controlled by	EQT 0097	306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0105	D-657 - D-657, MOTHER LIQUOR SURGE DRUM D-657	Controlled by	EQT 0097	306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0188	C-202 - Premixing Reactor	Controlled by	EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201
EQT 0189	C-207 - Veratrole Stripper	Controlled by	EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201
EQT 0190	C-217 - No. 1 Condensation Reactor	Controlled by	EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201
EQT 0191	C-219 - No. 2 Condensation Reactor	Controlled by	EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201
EQT 0192	C-221 - No. 3 Condensation Reactor	Controlled by	EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201
EQT 0193	C-223 - No. 4 Condensation Reactor	Controlled by	EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201
EQT 0194	C-225 - No. 5 Condensation Reactor	Controlled by	EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201
EQT 0195	C-227 - Polishing Reactor	Controlled by	EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201
EQT 0196	C-241 - Guaiacol Extraction Column	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0197	C-245 - Solvent 1 Washing Column	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0198	C-301 - Guaiacol Recovery Column	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0199	C-306 - Guaiacol/Tars Separator	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0200	C-312 - Solvent 1 Stripper Decanter	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0201	C-314 - Solvent 1 Stripper	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0202	C-316 - Solvent 1 Cold Trap	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0203	C-320 - Guaiacol Distillation Reflux Drum	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0204	C-322X - Solvent 1 Vacuum Package Separator	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0205	H-317 - Vacuum System	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0206	C-407 - Oxidation Reactor	Controlled by	EQT 0028	105 - 105, OXIDATION SCRUBBER C-419
EQT 0207	C-416 - Oxidation Column	Controlled by	EQT 0028	105 - 105, OXIDATION SCRUBBER C-419
EQT 0208	C-429 - CO2 Separator	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0209	C-435 - Vanillin Extraction Column	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0210	C-441 - Solvent 2 Washing Column	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0211	C-504 - Vanillin/Solvent 2 Atm. Distillation Column	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0212	C-507 - Vanillin/Solvent 2 Vacuum Distillation Column	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0213	C-516 - Solvent 2 Cold Trap	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0214	C-533X - Solvent 2 Vacuum Package Separator	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427

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Relationships:

ID	Description	Relationship	ID	Description
EQT 0215	C-565 - Solvent 2 Recovery Column (Aqueous Phase Stripper)	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0216	C-568 - Solvent 2 Recovery Column (Top Rectification)	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0217	E-428 - Condenser	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0218	H-520 - Vacuum System	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0219	C-525 - Tars Removal Column	Controlled by	EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557
EQT 0220	C-525 - Tars By-Pass Tank	Controlled by	EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557
EQT 0221	C-545 - Lights Removal Column	Controlled by	EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557
EQT 0222	C-555A/B - Vanillin Cold Traps	Controlled by	EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557
EQT 0223	C-562X - Vanillin Purification Vacuum Package Separator	Controlled by	EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557
EQT 0224	H-556 - Vacuum System	Controlled by	EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557
EQT 0225	C-634X - Dryer Scrubber	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0226	C-637X - Crystallization Vacuum Package Separator	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0227	C-640 - Dryer	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0228	C-805 - Solvent 3 Recovery Column	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0229	H-619 - Vacuum System	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0230	Y-620 - Centrifuge A	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0231	Y-621 - Centrifuge B	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0232	Y-640 - Dryer	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0233	C-606 - Guaiacol Distillation Column	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0234	C-683X - Guaiacol Vacuum Package Separator	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0235	C-687A/B - Guaiacol Distillation Cold Traps	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0236	C-754 - Veratrole Distillation Column	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0237	C-783X - Veratrole Vacuum Separator	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0238	C-787 - Veratrole Distillation Cold Traps	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0239	C-213 - First Reactor	Controlled by	EQT 0076	301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0240	C-215 - Second Reactor	Vents to	EQT 0239	C-213 - First Reactor
EQT 0241	C-217 - Third Reactor	Vents to	EQT 0243	C-231 - Fifth Reactor
EQT 0242	C-219 - Fourth Reactor	Vents to	EQT 0241	C-217 - Third Reactor
EQT 0243	C-231 - Fifth Reactor	Vents to	EQT 0240	C-215 - Second Reactor
EQT 0244	C-501 - Detarring Column	Vents to	EQT 0247	H-524 - Vacuum System
EQT 0245	C-521 - Final Dephenolizing Column	Vents to	EQT 0247	H-524 - Vacuum System
EQT 0246	E-418 - Phenol Condenser	Controlled by	EQT 0076	301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0247	H-524 - Vacuum System	Controlled by	EQT 0076	301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0248	C-301 - Water Stripper	Controlled by	EQT 0089	303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)

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Relationships:

ID	Description	Relationship	ID	Description
EQT 0249	C-313 - Extraction Column	Controlled by	EQT 0089	303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0250	C-405 - Dehydration Column	Controlled by	EQT 0089	303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0251	E-401 - Solvent Vent Condenser	Controlled by	EQT 0089	303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0252	C-536 - Splitter Column (PC/HQ Separation)	Controlled by	EQT 0094	304 - 304, PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)
EQT 0253	H-545 - Vacuum System	Controlled by	EQT 0094	304 - 304, PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)
EQT 0254	S-560 - PC Flaker	Controlled by	EQT 0094	304 - 304, PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)
EQT 0256	H-640 - Vacuum System for Crystallizers	Vents to	EQT 0097	306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)

Subject Item Groups:

ID	Group Type	Group Description
GRP 0006	Equipment Group	- Cathy
GRP 0012	Equipment Group	- Daphne
GRP 0013	Equipment Group	- Vanessa
GRP 0014	Equipment Group	WWT - EMISSIONS CAP - WW TREATMENT PLANT
GRP 0022	Equipment Group	Fire Pump Diesel Engines - Fire Pump Diesel Engines
UNF 0001	Unit or Facility Wide	- Cathyval Plant

Group Membership:

ID	Description	Member of Groups
EQT 0009	101 - 101, LIGHTS TANK FARM SCRUBBER C-165	GRP0000000013
EQT 0010	D-148 - D-148, VANILLIN SOLVENT 1 TANK (MIBK STORAGE) D-148	GRP0000000013
EQT 0011	D-149 - D-149, ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)	GRP0000000013
EQT 0012	D-152 - D-152, SOLVENT 2 TANK (MIBK STORAGE) D-152	GRP0000000013
EQT 0013	D-153 - D-153, SOLVENT 2 TANK (MIBK STORAGE) D-153	GRP0000000013
EQT 0014	D-169 - D-169, SOLVENT 3 TANK (METHANOL STORAGE) D-169	GRP0000000013
EQT 0015	102 - 102, HEAVIES TANK FARM SCRUBBER C-187	GRP0000000013
EQT 0016	D-107 (Vanessa) - D-107 (Vanessa), GUAICOL STORAGE TANK D-107	GRP0000000013
EQT 0017	D-111 (Vanessa) - D-111 (Vanessa), GUETOL STORAGE TANK D-111	GRP0000000013
EQT 0018	D-113 (Vanessa) - D-113 (Vanessa), GLYOXYLIC ACID STORAGE TANK D-113	GRP0000000013
EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201	GRP0000000013
EQT 0020	C-216 - C-216, GUAICOL RECYCLE TANK C-216	GRP0000000013
EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248	GRP0000000013
EQT 0022	C-236 - C-236, NEUTRALIZATION SURGE TANK C-236	GRP0000000013
EQT 0023	C-240 - C-240, EXTRACTOR TAILS UPSET TANK C-240	GRP0000000013
EQT 0024	C-243 - C-243, EXTRACTOR 1 TAILS SAFETY DECANter C-243	GRP0000000013
EQT 0025	C-244 - C-244, MANDELATE SURGE TANK C-244	GRP0000000013

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Group Membership:

ID	Description	Member of Groups
EQT 0026	C-249 - C-249, SOLVENT 1 SURGE TANK C-249	GRP0000000013
EQT 0027	C-247 - C-247, SOLVENT 1 WASHING SAFETY DECANter C-247	GRP0000000013
EQT 0028	105 - 105, OXIDATION SCRUBBER C-419	GRP0000000013
EQT 0029	C-409 - C-409, MANDELATE SURGE TANK C-409	GRP0000000013
EQT 0030	C-417 - D-417, OXIDATION SURGE TANK D-417	GRP0000000013
EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427	GRP0000000013
EQT 0032	C-421 - C-421, SOLVENT 2 SURGE TANK C-421	GRP0000000013
EQT 0033	C-430 - C-430, SOLVENT 2 DECANter C-430	GRP0000000013
EQT 0034	C-432 - C-432, EXTRACTION 2 DRAIN TANK C-432	GRP0000000013
EQT 0035	C-434 - C-434, EXTRACTION 2 TAILS SAFETY DECANter C-434	GRP0000000013
EQT 0036	C-441 - C-441, AQUEOUS PHASE SURGE TANK C-441	GRP0000000013
EQT 0037	C-501 - C-501, SOLVENT 2 DISTILLATION SURGE TANK C-501	GRP0000000013
EQT 0038	C-558 - C-558, AQUEOUS EFFLUENTS TANK C-558	GRP0000000013
EQT 0039	C-575 - C-575, SOLVENT 2 RECOVERY DECANter C-575	GRP0000000013
EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557	GRP0000000013
EQT 0041	C-535 - C-535, TARS SURGE TANK C-535	GRP0000000013
EQT 0042	C-616 - C-616, FLAKER SURGE TANK C-616	GRP0000000013
EQT 0043	C-648 - C-648, RECYCLE PRODUCT HOPPER MELTER C-648	GRP0000000013
EQT 0044	C-655 - C-655, MELTER SURGE TANK C-655	GRP0000000013
EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624	GRP0000000013
EQT 0046	C-541 - C-541, METHANOL WASHING DRUM C-541 (Vents through C-801)	GRP0000000013
EQT 0047	C-801 - C-801, SOLVENT 3 RECOVERY FEED TANK C-801	GRP0000000013
EQT 0048	C-603 - C-603, DISOLVER C-603	GRP0000000013
EQT 0049	C-606 - C-606, VACUUM CRYSTALLIZER C-606	GRP0000000013
EQT 0050	C-617 - C-617, CENTRIFUGE SURGE TANK C-617	GRP0000000013
EQT 0051	109 - 109, BAGHOUSE FILTER/SCRUBBER C-704	GRP0000000013
EQT 0052	201 - 201, TANK FARM SCRUBBER C-146	GRP0000000012
EQT 0053	D-111 (Daphne) - D-111 (Daphne), PYROCATeCHOL STORAGE TANK	GRP0000000012
EQT 0055	D-141 - D-141, VERATROLE STORAGE TANK D-141	GRP0000000012
EQT 0057	C-201 - C-201, PC DISSOLUTION TANK C-201	GRP0000000012
EQT 0058	C-553 - C-553, GUAIACOL DISTILLATION FEED TANK C-553	GRP0000000012
EQT 0059	C-561 - C-561, RECYCLE PROCESS WATER TANK C-561	GRP0000000012
EQT 0060	C-603 - C-603, GUAIACOL DISTILLATION KETTLE C-603	GRP0000000012
EQT 0061	C-615 - C-615, TARS RECEIVER C-615	GRP0000000012
EQT 0062	C-645 - C-645, PMDB RECEIVER C-645	GRP0000000012
EQT 0063	C-651 - C-651, PC RECEIVER C-651	GRP0000000012
EQT 0064	C-655 - C-655, GUAIACOL LT. ENDS RECEIVER C-655	GRP0000000012
EQT 0065	C-660 - C-660, INTERS./VERATROLE RECEIVER C-660	GRP0000000012
EQT 0066	C-665 - C-665, SECOND RECEIVER C-665	GRP0000000012
EQT 0067	C-670 - C-670, END OF CAMPAIGN RECEIVER C-670	GRP0000000012
EQT 0068	C-675 - C-675, GUAIACOL RECEIVER C-675	GRP0000000012

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Group Membership:

ID	Description	Member of Groups
EQT 0069	C-701 - C-701, CRUDE VERATROLE WASH TANK C-701	GRP0000000012
EQT 0070	C-705 - C-705, WATER GUAICOLATE RECEIVER C-705	GRP0000000012
EQT 0071	C-710 - C-710, CAUSTIC WASH RECEIVER C-710	GRP0000000012
EQT 0072	C-751 - C-751, VERATROLE DISTILLATION KETTLE C-751	GRP0000000012
EQT 0073	C-765 - C-765, LT. ENDS RECEIVER C-765	GRP0000000012
EQT 0074	C-770 - C-770, DISTILLED VERATROLE RECEIVER C-770	GRP0000000012
EQT 0076	301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)	GRP0000000006
EQT 0077	C-223 - C-223, PHENOL DRAIN TANK REACTION SURGE DRUM C-223	GRP0000000006
EQT 0078	C-416 - C-416, PREDEPHENOL REFLUX DRUM C-416	GRP0000000006
EQT 0079	C-508 - C-508, VERTICAL TAR DILUTER C-508	GRP0000000006
EQT 0080	C-530 - C-530, DISTILLATION DRAN TANK C-530	GRP0000000006
EQT 0081	C-532 - C-532, TAILS SURGE DRUM C-532	GRP0000000006
EQT 0083	C-113 - C-113, PHENOL UNLOADING TANK C-113	GRP0000000006
EQT 0084	D-107 - D-107, WASHWATER TANK D-107	GRP0000000006
EQT 0085	D-111 - D-111, PHENOL MAKE-UP TANK D-111	GRP0000000006
EQT 0086	D-115 - D-115, WASHWATER/GUAICOL TANK D-115	GRP0000000006
EQT 0087	D-315 - D-315, RAFFINATE TANK D-315	GRP0000000006
EQT 0088	D-204 - D-204, RECYCLE PHENOL TANK D-204	GRP0000000006
EQT 0090	C-320 - C-320, IPE STORAGE TANK C-320	GRP0000000006
EQT 0091	C-308 - C-308, IPE SETTLER C-308	GRP0000000006
EQT 0092	C-311 - C-311, WASHWATER DRUM C-311	GRP0000000006
EQT 0093	C-322 - C-322, ETHER DRAIN TANK C-322	GRP0000000006
EQT 0095	C-551 - C-551, PC RECEIVING DRUM C-551	GRP0000000006
EQT 0096	C-563 - C-563, PC FLAKER FEED TANK C-563	GRP0000000006
EQT 0098	C-650 - C-650, REFLUX SURGE DRUM C-650	GRP0000000006
EQT 0099	D-607 - D-607, HQ DISSOLVER TANK D-607	GRP0000000006
EQT 0100	D-610 - D-610, HQ SURGE TANK D-610	GRP0000000006
EQT 0101	D-612 - D-612, CARBON TREATER TANK D-612	GRP0000000006
EQT 0102	D-632 - D-632, CRYSTALLIZATION TANK D-632	GRP0000000006
EQT 0103	D-652 - D-652, MOTHER LIQUOR SURGE TANK D-652	GRP0000000006
EQT 0104	D-653 - D-653, CONC. COLUMN FEED TANK D-653	GRP0000000006
EQT 0105	D-657 - D-657, MOTHER LIQUOR SURGE DRUM D-657	GRP0000000006
EQT 0106	307 - 307, SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601	GRP0000000006
EQT 0107	308 - 308, OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)	GRP0000000006
EQT 0109	310 - 310, CARBON BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)	GRP0000000006
EQT 0110	311 - 311, PC PACKAGING BAGHOUSE Y-731 (P&I.D. F703)	GRP0000000006
EQT 0111	312 - 312, HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)	GRP0000000006
EQT 0112	313 - 313, HQ REWORK DUMPER BAGHOUSE S-693 FOR D607 (P&I.D. F602)	GRP0000000006
EQT 0113	315A - 315A, FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)	GRP0000000006
EQT 0114	315B - 315B, PRIMARY FLUID HEATER F-971 (P&I.D. F925)	GRP0000000006
EQT 0115	316 - 316, PRESSURE LEAF FILTER DRYING VENT Y-625	GRP0000000006

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Group Membership:

ID	Description	Member of Groups
EQT 0116	317 - 317, VACUUM CLEAN-UP PACKAGING BAGHOUSE Y-760X (P&I.D. F703)	GRP0000000006
EQT 0118	401A - 401A, WWT TANK NO. 28 (P&I.D. F101)	GRP0000000014
EQT 0119	401B - 401B, STORMWATER TANK NO. 29 (P&I.D. F101)	GRP0000000014
EQT 0120	401C - 401C, TANK D-197	GRP0000000014
EQT 0121	402A - 402A, WEST AERATION BASIN D210	GRP0000000014
EQT 0122	402B - 402B, EAST AERATION BASIN D213 (P&I.D. F201)	GRP0000000014
EQT 0123	402C - 402C, WEST CLARIFIER D301 (P&I.D. F302)	GRP0000000014
EQT 0124	402D - 402D, EAST CLARIFIER D304 (P&I.D. F302)	GRP0000000014
EQT 0127	C-101 - C-101, IPE SOLVENT STORAGE TANK C-101	GRP0000000012
EQT 0128	C-351 - C-351, RAG LAYER DIVERTING TANK C-351	GRP0000000012
EQT 0129	C-401 - C-401, AQUEOUS PHASE SURGE TANK C-401	GRP0000000012
EQT 0130	C-352 - C-352, RAG LAYER SURGE TANK C-352	GRP0000000012
EQT 0131	C-461 - C-461, AQUEOUS EFFLUENT TANK C-461	GRP0000000012
EQT 0132	C-521 - C-521, ORGANIC PHASE SURGE TANK C-521	GRP0000000012
EQT 0133	C-132 - C-132, MeCl STORAGE TANK C-132	GRP0000000012
EQT 0134	C-136 - C-136, EICI STORAGE TANK C-136	GRP0000000012
EQT 0135	C-301 - C-301, ACIDIFICATION/DECANTATION TANK C-301	GRP0000000012
EQT 0136	C-503 - C-503, DEETHERATION IPE DECANter C-503	GRP0000000012
EQT 0137	D-681 - D-681, SCREENER RESIDUE DISSOLVER D-681	GRP0000000006
EQT 0139	110 - 110, HIGH PURITY PC MIXING VESSEL	GRP0000000006
EQT 0188	C-202 - Premixing Reactor	GRP0000000013
EQT 0189	C-207 - Veratrole Stripper	GRP0000000013
EQT 0190	C-217 - No. 1 Condensation Reactor	GRP0000000013
EQT 0191	C-219 - No. 2 Condensation Reactor	GRP0000000013
EQT 0192	C-221 - No. 3 Condensation Reactor	GRP0000000013
EQT 0193	C-223 - No. 4 Condensation Reactor	GRP0000000013
EQT 0194	C-225 - No. 5 Condensation Reactor	GRP0000000013
EQT 0195	C-227 - Polishing Reactor	GRP0000000013
EQT 0196	C-241 - Guaiacol Extraction Column	GRP0000000013
EQT 0197	C-245 - Solvent 1 Washing Column	GRP0000000013
EQT 0198	C-301 - Guaiacol Recovery Column	GRP0000000013
EQT 0199	C-306 - Guaiacol/Tars Separator	GRP0000000013
EQT 0200	C-312 - Solvent 1 Stripper Decanter	GRP0000000013
EQT 0201	C-314 - Solvent 1 Stripper	GRP0000000013
EQT 0202	C-316 - Solvent 1 Cold Trap	GRP0000000013
EQT 0203	C-320 - Guaiacol Distillation Reflux Drum	GRP0000000013
EQT 0204	C-322X - Solvent 1 Vacuum Package Separator	GRP0000000013
EQT 0205	H-317 - Vacuum System	GRP0000000013
EQT 0206	C-407 - Oxidation Reactor	GRP0000000013
EQT 0207	C-416 - Oxidation Column	GRP0000000013
EQT 0208	C-429 - CO2 Separator	GRP0000000013

INVENTORIES

AI ID: 1314 - Rhodia Inc
Activity Number: PER20100003
Permit Number: 2184-V2
Air - Title V Regular Permit Renewal

Group Membership:

ID	Description	Member of Groups
EQT 0209	C-435 - Vanillin Extraction Column	GRP0000000013
EQT 0210	C-441 - Solvent 2 Washing Column	GRP0000000013
EQT 0211	C-504 - Vanillin/Solvent 2 Atm. Distillation Column	GRP0000000013
EQT 0212	C-507 - Vanillin/Solvent 2 Vacuum Distillation Column	GRP0000000013
EQT 0213	C-516 - Solvent 2 Cold Trap	GRP0000000013
EQT 0214	C-533X - Solvent 2 Vacuum Package Separator	GRP0000000013
EQT 0215	C-565 - Solvent 2 Recovery Column (Aqueous Phase Stripper)	GRP0000000013
EQT 0216	C-568 - Solvent 2 Recovery Column (Top Rectification)	GRP0000000013
EQT 0217	E-428 - Condenser	GRP0000000013
EQT 0218	H-520 - Vacuum System	GRP0000000013
EQT 0219	C-525 - Tars Removal Column	GRP0000000013
EQT 0220	C-525 - Tars By-Pass Tank	GRP0000000013
EQT 0221	C-545 - Lights Removal Column	GRP0000000013
EQT 0222	C-555A/B - Vanillin Cold Traps	GRP0000000013
EQT 0223	C-562X - Vanillin Purification Vacuum Package Separator	GRP0000000013
EQT 0224	H-556 - Vacuum System	GRP0000000013
EQT 0225	C-634X - Dryer Scrubber	GRP0000000013
EQT 0226	C-637X - Crystallization Vacuum Package Separator	GRP0000000013
EQT 0227	C-640 - Dryer	GRP0000000013
EQT 0228	C-805 - Solvent 3 Recovery Column	GRP0000000013
EQT 0229	H-619 - Vacuum System	GRP0000000013
EQT 0230	Y-620 - Centrifuge A	GRP0000000013
EQT 0231	Y-621 - Centrifuge B	GRP0000000013
EQT 0232	Y-640 - Dryer	GRP0000000013
EQT 0233	C-606 - Guaiacol Distillation Column	GRP0000000012
EQT 0234	C-683X - Guaiacol Vacuum Package Separator	GRP0000000012
EQT 0235	C-687A/B - Guaiacol Distillation Cold Traps	GRP0000000012
EQT 0236	C-754 - Veratrole Distillation Column	GRP0000000012
EQT 0237	C-783X - Veratrole Vacuum Separator	GRP0000000012
EQT 0238	C-787 - Veratrole Distillation Cold Traps	GRP0000000012
EQT 0239	C-213 - First Reactor	GRP0000000006
EQT 0240	C-215 - Second Reactor	GRP0000000006
EQT 0241	C-217 - Third Reactor	GRP0000000006
EQT 0242	C-219 - Fourth Reactor	GRP0000000006
EQT 0243	C-231 - Fifth Reactor	GRP0000000006
EQT 0244	C-501 - Detarring Column	GRP0000000006
EQT 0245	C-521 - Final Dephenolizing Column	GRP0000000006
EQT 0246	E-418 - Phenol Condenser	GRP0000000006
EQT 0247	H-524 - Vacuum System	GRP0000000006
EQT 0248	C-301 - Water Stripper	GRP0000000006
EQT 0249	C-313 - Extraction Column	GRP0000000006

INVENTORIES

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

Group Membership:

ID	Description	Member of Groups
EQT 0250	C-405 - Dehydration Column	GRP0000000006
EQT 0251	E-401 - Solvent Vent Condenser	GRP0000000006
EQT 0252	C-536 - Splitter Column (PC/HQ Separation)	GRP0000000006
EQT 0253	H-545 - Vacuum System	GRP0000000006
EQT 0254	S-560 - PC Flaker	GRP0000000006
EQT 0255	C-251 - Batch Reactor	GRP0000000012
EQT 0256	H-640 - Vacuum System for Crystallizers	GRP0000000006
EQT 0257	C-451 - Extraction Column	GRP0000000012
EQT 0258	C-501 - Detheration Column	GRP0000000012
EQT 0259	C-511 - Detheration Guaiacol Decanter	GRP0000000012
EQT 0260	C-551 - Crude Guaiacol Dehydration Column	GRP0000000012
EQT 0261	C-555 - Wet Guaiacol Tank	GRP0000000012
EQT 0286	M-8A - Fire-Water Pump G972A	GRP0000000022
EQT 0287	M-8B - Fire-Water Pump G972B	GRP0000000022
FUG 0001	F-6V - F-6V, VANESSA FUGITIVE EMISSIONS	GRP0000000013
FUG 0004	F-6C - F-6C, CATHY FUGITIVE EMISSIONS	GRP0000000006
FUG 0005	F-6D - F-6D, DAPHNE FUGITIVE EMISSIONS	GRP0000000012

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0630	0630 Organic Oxides, Alcohols, Glycols (Rated Capacity)	88	MM lbs/yr

SIC Codes:

2819	Industrial inorganic chemicals, nec	AI 1314
2869	Industrial organic chemicals, nec	UNF 001

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Cathyval Plant															
EQT 0009 101													0.04		0.16
EQT 0015 102													0.001		0.01
EQT 0019 103													0.01	0.02	0.05
EQT 0021 104													0.03	0.03	0.12
EQT 0028 105													0.12	0.18	0.53
EQT 0031 106													0.21	0.82	0.90
EQT 0040 107													<0.001	0.10	0.01
EQT 0045 108													0.002	0.002	0.01
EQT 0051 109							0.02	0.03	0.07						
EQT 0052 201													0.01		0.04
EQT 0056 202													0.16	1.12	0.78
EQT 0075 203							0.04	0.09	0.02						
EQT 0076 301													0.04	5.44	0.19
EQT 0082 302													0.08	16.04	0.34
EQT 0089 303													0.82	8.21	3.68
EQT 0094 304													0.01	0.30	0.05
EQT 0097 305													0.02	0.03	0.06
EQT 0106 307							0.001	0.002	<0.01						
EQT 0107 308							0.001	0.002	<0.01						
EQT 0109 310							0.001	0.001	<0.01						
EQT 0110 311							0.05	0.10	0.22						
EQT 0111 312							0.05	0.10	0.22						
EQT 0112 313							0.01	0.01	0.02						

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Cathyval Plant															
EQT 0113 315A	0.48	0.48	0.73	0.58	0.58	0.87	0.04	0.04	0.07	0.003	0.003	0.01	0.03	0.03	0.05
EQT 0114 315B	0.65	0.65	2.83	0.77	0.77	3.37	0.06	0.06	0.26	0.005	0.005	0.02	0.04	0.04	0.19
EQT 0115 316													<0.001	0.004	<0.01
EQT 0116 317							<0.001	0.40	<0.01						
EQT 0125 M-5							0.21		0.92						
EQT 0126 M-6													0.005		0.02
EQT 0139 110													0.05	0.06	0.01
EQT 0288 M-9	1.48	1.48	0.30	6.88	6.88	1.38	0.49	0.49	0.10	0.46	0.46	0.09	0.56	0.56	0.11
FUG 0001 F-6V													0.11		0.46
FUG 0004 F-6C													0.26		1.12
FUG 0005 F-6D													0.13		0.59
GRP 0014 WWT													4.01		17.55
GRP 0022 Fire Pump Diesel Engine	2.47	2.47	0.12	11.47	11.47	0.57	0.81	0.81	0.04	0.76	0.76	0.04	0.93	0.93	0.05

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0009 101	Methanol	0.001		<0.01
	Methyl isobutyl ketone	0.04		0.16
EQT 0021 104	Methyl isobutyl ketone	0.03	0.03	0.12
EQT 0028 105	Methanol	0.001	0.001	<0.01
	Methyl isobutyl ketone	0.08	0.12	0.35
EQT 0031 106	Methyl isobutyl ketone	0.21	0.82	0.90
EQT 0040 107	Methyl isobutyl ketone	<0.001	0.10	0.01
EQT 0045 108	Methanol	0.002	0.002	0.01
EQT 0052 201	Pyrocatechol	0.01		0.03
EQT 0056 202	Hydroquinone	0.001	0.05	<0.01
	Methanol	0.001	0.005	<0.01
	Pyrocatechol	0.01	0.05	0.02
EQT 0075 203	Hydroquinone	0.04	0.09	0.02
	Pyrocatechol	0.04	0.09	0.02
EQT 0076 301	Hydroquinone	<0.001	0.04	<0.01
	Phenol	0.04	4.93	0.17
	Pyrocatechol	0.004	0.47	0.02
EQT 0082 302	Phenol	0.005	2.54	0.02
EQT 0089 303	Phenol	<0.001	0.01	<0.01
EQT 0094 304	Pyrocatechol	0.01	0.30	0.05
EQT 0097 306	Hydroquinone	0.01	0.02	0.04
EQT 0110 311	Pyrocatechol	0.05	0.10	0.22
EQT 0111 312	Hydroquinone	0.05	0.10	0.22
EQT 0112 313	Hydroquinone	0.01	0.01	0.02
EQT 0115 316	Hydroquinone	<0.001	0.004	<0.01
EQT 0116 317	Hydroquinone	<0.001	0.32	<0.01
	Pyrocatechol	<0.001	0.08	<0.01
EQT 0126 M-6	Methyl isobutyl ketone	<0.001		<0.01
	Phenol	<0.001		<0.01
FUG 0001 F-6V	Methanol	0.04		0.18
	Methyl isobutyl ketone	0.06		0.28
FUG 0004 F-6C	Hydroquinone	0.003		0.01
	Phenol	0.06		0.28

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
FUG 0004 F-6C	Pyrocatechol	0.003		0.01
FUG 0005 F-6D	Chloroethane	0.03		0.12
	Hydroquinone	0.001		0.01
	Methyl chloride	0.05		0.23
	Pyrocatechol	0.01		0.03
GRP 0014 WWT	Methanol	0.72		3.16
	Methyl isobutyl ketone	1.74		7.63
	Phenol	0.01		0.03
	Pyrocatechol	0.01		0.05
UNF 0001	Chloroethane			0.12
	Hydroquinone			0.36
	Methanol			3.38
	Methyl chloride			0.23
	Methyl isobutyl ketone			9.46
	Phenol			0.52
	Pyrocatechol			0.46

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0009 101 - 101, LIGHTS TANK FARM SCRUBBER C-165

- 1 [LAC 33:III.2115.K.4] Maintain records to demonstrate that the waste gas stream from methanol unloading (line purge) is less than 100 lbs/24-hour period. [LAC 33:III.2115.K.4, LAC 33:III.2115.H.1.c]
- 2 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency, i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 3 [LAC 33:III.501.C.6] Flow rate ≥ 2.0 gallons/min. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 4 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
- 5 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all organic contents and washed or (2) emit only breathing losses which have been included in the permit emissions limits (limited to 10 days per year). STATE ONLY.
- 6 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 7 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

EQT 0010 D-148 - D-148, VANILLIN SOLVENT 1 TANK (MIBK STORAGE) D-148

- 8 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 9 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0011 D-149 - D-149, ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)

- 10 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 11 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0012 D-152 - D-152, SOLVENT 2 TANK (MIBK STORAGE) D-152

- 12 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 13 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0013 D-153 - D-153, SOLVENT 2 TANK (MIBK STORAGE) D-153

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20100003
Permit Number: 2184-V2
Air - Title V Regular Permit Renewal

EQT 0013 D-153 - D-153, SOLVENT 2 TANK (MIBK STORAGE) D-153

14. [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
15. [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0014 D-169 - D-169, SOLVENT 3 TANK (METHANOL STORAGE) D-169

16. [LAC 33:III.2103.A] Equip with submerged fill pipe.
17. [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0015 102 - 102, HEAVIES TANK FARM SCRUBBER C-187

18. [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.
19. [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
Which Months: All Year Statistical Basis: None specified
20. [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
21. [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
22. [LAC 33:III.501.C.6] Flow rate \geq 3.6 gallons/min. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
23. [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

EQT 0016 D-107 (Vanessa) - D-107 (Vanessa), GUAIACOL STORAGE TANK D-107

24. [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
25. [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0017 D-111 (Vanessa) - D-111 (Vanessa), GUETOL STORAGE TANK D-111

26. [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
27. [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0018 D-113 (Vanessa) - D-113 (Vanessa), GLYOXYLIC ACID STORAGE TANK D-113

- 28 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 29 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0019 103 - 103, CONDENSATION SCRUBBER C-201

- 30 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
- 31 [LAC 33:III.501.C.6] Submit annual report to LDEQ by March 31st of each year listing hours that the scrubber operated out of range. STATE ONLY.
- 32 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.
- 33 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
- 34 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency, i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 35 [LAC 33:III.501.C.6] Flow rate ≥ 2.1 gallons/min. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average

EQT 0020 C-216 - C-216, GUAIACOL RECYCLE TANK C-216

- 36 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 37 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 38 [LAC 33:III.501.C.6] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this tank. MACT is not required. STATE ONLY.

EQT 0021 104 - 104, SOLVENT 1 VENT SCRUBBER C-248

- 39 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
- 40 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.
- 41 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0021 104 - 104, SOLVENT 1 VENT SCRUBBER C-248

- 42 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
- 43 [LAC 33:III.501.C.6] Flow rate \geq 1.95 gallons/min. STATE ONLY.
- 44 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: Four-hour average
Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
- 45 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified
Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

EQT 0022 C-236 - C-236, NEUTRALIZATION SURGE TANK C-236

- 46 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 47 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0023 C-240 - C-240, EXTRACTOR TAILS UPSET TANK C-240

- 48 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 49 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0024 C-243 - C-243, EXTRACTOR 1 TAILS SAFETY DECANter C-243

- 50 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0025 C-244 - C-244, MANDELATE SURGE TANK C-244

- 51 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 52 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0026 C-249 - C-249, SOLVENT 1 SURGE TANK C-249

- 53 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0026 C-249 - C-249, SOLVENT 1 SURGE TANK C-249

- 54 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0027 C-247 - C-247, SOLVENT 1 WASHING SAFETY DECANter C-247

- 55 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0028 105 - 105, OXIDATION SCRUBBER C-419

- 56 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
- 57 [LAC 33:III.501.C.6] Flow rate \geq 18.0 gallons/min. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 58 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 59 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.
- 60 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
- 61 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 62 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

EQT 0029 C-409 - C-409, MANDELATE SURGE TANK C-409

- 63 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 64 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0030 C-417 - D-417, OXIDATION SURGE TANK D-417

- 65 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0030 C-417 - D-417, OXIDATION SURGE TANK D-417

- 66 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0031 106 - 106, VANILLIN EXTRACTION SCRUBBER C-427

- 67 [LAC 33:III.2103.I.3] Record date and reason for any maintenance and repair of the applicable control devices and the estimated quantity and duration of VOC emissions during such activities.
- 68 [LAC 33:III.2103.I.7] Keep records of planned routine maintenance performed on the vapor loss control system, including the duration of each time the vapor loss control system does not meet the 95% VOC control requirement due to the planned routine maintenance. Record starting date/time and ending date/time of the maintenance period in which 95% control is not met.
- 69 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature ≥ 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (condenser/scrubber in series) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
- 70 [LAC 33:III.2115.J.1] Which Months: All Year Statistical Basis: None specified
Demonstrate compliance with LAC 33:III.2115 as requested by DEQ.
- 71 [LAC 33:III.2115.J.2] Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC 33:III.2115.J.2.a through e.
- 72 [LAC 33:III.2115.J] Comply with LAC 33:III.2115 as soon as practicable but in no event later than August 20, 2003. Comply with the requirements of LAC 33:III.2115 as soon as practicable, but in no event later than one year from the promulgation of the regulation revision, if subject to LAC 33:III.2115 as a result of a revision of LAC 33:III.2115.
- 73 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain the records specified in LAC 33:III.2115.K.1 through K.3. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
- 74 [LAC 33:III.501.C.6] Temperature ≤ 42 F. Temperature of scrubber water feed shall be maintained, except when oxidation/neutralization section is shutdown.
- 75 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: Daily average
- 76 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.
- 77 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency based on the DCS.
- 78 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified
Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed.
- 79 [LAC 33:III.5109.A] Flow rate ≥ 2.4 gallons/min.
Which Months: All Year Statistical Basis: Daily average
Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0032 C-421 - C-421, SOLVENT 2 SURGE TANK C-421

- 80 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 81 [LAC 33:III.2103.E.1] VOC, Total \geq 95 % control efficiency using a vapor loss control system (condenser/scrubber). This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: None specified

EQT 0033 C-430 - C-430, SOLVENT 2 DECANter C-430

- 82 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature \geq 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (condenser/scrubber) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
Which Months: All Year Statistical Basis: None specified
- 83 [LAC 33:III.2115.J.1] Demonstrate compliance with LAC 33:III.2115 as requested by DEQ.
- 84 [LAC 33:III.2115.J.2] Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC 33:III.2115.J.2.a through e.
- 85 [LAC 33:III.2115.K.4] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Exempt from LAC 33:III.2115 when oxidation reaction section is shutdown. Maintain the records specified in LAC 33:III.2115.K.4. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0034 C-432 - C-432, EXTRACTION 2 DRAIN TANK C-432

- 86 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 87 [LAC 33:III.2103.E.1] VOC, Total \geq 95 % control efficiency using a vapor loss control system (condenser/scrubber). This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: None specified

EQT 0035 C-434 - C-434, EXTRACTION 2 TAILS SAFETY DECANter C-434

- 88 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0036 C-441 - C-441, AQUEOUS PHASE SURGE TANK C-441

- 89 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 90 [LAC 33:III.2103.E.1] VOC, Total \geq 95 % control efficiency using a vapor loss control system (condenser/scrubber). This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: None specified

EQT 0037 C-501 - C-501, SOLVENT 2 DISTILLATION SURGE TANK C-501

- 91 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 92 [LAC 33:III.2103.E.1] VOC, Total \geq 95 % control efficiency using a vapor loss control system (condenser/scrubber). This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: None specified

EQT 0038 C-558 - C-558, AQUEOUS EFFLUENTS TANK C-558

- 93 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 94 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0039 C-575 - C-575, SOLVENT 2 RECOVERY DECANter C-575

- 95 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0040 107 - 107, DISTILLATION SCRUBBER C-557

- 96 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
- 97 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
- 98 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0040 107 - 107, DISTILLATION SCRUBBER C-557

- 99 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.
- 100 [LAC 33:III.501.C.6] Flow rate \geq 1.0 gallons/min. STATE ONLY.
- 101 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: Four-hour average
- 102 [LAC 33:III.5109.A] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

EQT 0041 C-535 - C-535, TARS SURGE TANK C-535

- 103 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 104 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0042 C-616 - C-616, FLAKER SURGE TANK C-616

- 105 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 106 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0043 C-648 - C-648, RECYCLE PRODUCT HOPPER MELTER C-648

- 107 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0044 C-655 - C-655, MELTER SURGE TANK C-655

- 108 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 109 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0045 108 - 108, CRYSTALLIZATION SCRUBBER C-624

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0045 108 - 108, CRYSTALLIZATION SCRUBBER C-624

- 110 [LAC 33:III.2103.E.1] VOC, Total \geq 95 % control efficiency. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: None specified
- 111 [LAC 33:III.2103.I.3] Record date and reason for any maintenance and repair of the applicable control devices and the estimated quantity and duration of VOC emissions during such activities.
- 112 [LAC 33:III.2103.I.7] Keep records of planned routine maintenance performed on the vapor loss control system, including the duration of each time the vapor loss control system does not meet the 95% VOC control requirement due to the planned routine maintenance. Record starting date/time and ending date/time of the maintenance period in which 95% control is not met.
- 113 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
- 114 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS).
Which Months: All Year Statistical Basis: None specified
- 115 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.
- 116 [LAC 33:III.501.C.6] Flow rate \geq 2.1 gallons/min.
Which Months: All Year Statistical Basis: Four-hour average
- 117 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed.
- 118 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

EQT 0046 C-541 - C-541, METHANOL WASHING DRUM C-541 (Vents through C-801)

- 119 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0047 C-801 - C-801, SOLVENT 3 RECOVERY FEED TANK C-801

- 120 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 121 [LAC 33:III.2103.E.1] VOC, Total \geq 95 % control efficiency using a vapor loss control system (scrubber). This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0048 C-603 - C-603, DISOLVER C-603

- 122 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0049 C-606 - C-606, VACUUM CRYSTALLIZER C-606

- 123 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0050 C-617 - C-617, CENTRIFUGE SURGE TANK C-617

- 124 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 125 [LAC 33:III.2103.E.1] VOC, Total \geq 95 % control efficiency using a vapor loss control system (scrubber). This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: None specified

EQT 0051 109 - 109, BAGHOUSE FILTER/SCRUBBER C-704

- 126 [LAC 33:III.1305] Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7.
- 127 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy once every four hours based on the DCS. STATE ONLY.
- 128 [LAC 33:III.501.C.6] Particulate matter (10 microns or less): Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III.Chapter 13. STATE ONLY.
- 129 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 130 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.
- 131 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 132 [LAC 33:III.501.C.6] Flow rate \geq 175.0 gallons/min with excess NaOH. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average

EQT 0052 201 - 201, TANK FARM SCRUBBER C-146

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0052 201 - 201, TANK FARM SCRUBBER C-146

- 133 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
- 134 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 135 [LAC 33:III.501.C.6] Flow rate \geq 1.4 gallons/min. STATE ONLY.
- 136 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: Four-hour average
- 137 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.
- 138 [LAC 33:III.5109.A] Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
- Which Months: All Year Statistical Basis: None specified
- Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber for which permitted site-wide emissions are greater than MER. MACT is not required.

EQT 0053 D-111 (Daphne) - D-111 (Daphne), PYROCATECHOL STORAGE TANK

- 139 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 140 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0054 D-128 - D-128, TARS STORAGE TANK D-128

- 141 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 142 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0055 D-141 - D-141, VERATROLE STORAGE TANK D-141

- 143 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 144 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0056 202 - 202, VENT SCRUBBER C-685

- 145 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0056 202 - 202, VENT SCRUBBER C-685

- 146 [LAC 33:III.2147] LAC 33:III.Chapter 21, Subchapter J - Limiting VOC Emissions from Reactor Processes and Distillation Operations in the SOCM. Daphne is subject to LAC 33:III.2147 only if/when producing anisole. Daphne does not currently produce anisole. Before beginning anisole production, Rhodia will determine the applicability of all vents. For all subject vents, Rhodia will come into compliance with LAC 33:III.2147 prior to the startup of anisole campaign.
- 147 [LAC 33:III.501.C.6] Flow rate ≥ 7.0 gallons/min. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 148 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
- 149 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.
- 150 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 151 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 152 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs for which site-wide emissions are greater than the MER are emitted from this scrubber. MACT is not required.

EQT 0057 C-201 - C-201, PC DISSOLUTION TANK C-201

- 153 [LAC 33:III.2149.C.1] VOC, Total ≥ 90 % reduction based on mass emission rate from individual process vent streams in aggregate within a batch process. For the pool of non-exempt batch process vents (C-251, C-301, C-201, and C-603), per LAC 33:III.2149.C.2.a, overall 90% control is achieved by controlling only C-251 and C-301 with greater than 99% efficiency. Use the RACT equation specified in LAC 33:III.2149.C.1 as applicable.
[LAC 33:III.2149.C.1, LAC 33:III.2149.C.2.f]
Which Months: All Year Statistical Basis: None specified
- 154 [LAC 33:III.2149.G.1.b] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

EQT 0058 C-553 - C-553, GUAIACOL DISTILLATION FEED TANK C-553

- 155 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 156 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0059 C-561 - C-561, RECYCLE PROCESS WATER TANK C-561

- 157 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20100003
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EQT 0059 C-561 - C-561, RECYCLE PROCESS WATER TANK C-561

- 158 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0060 C-603 - C-603, GUAIACOL DISTILLATION KETTLE C-603

- 159 [LAC 33:III.2149.C.1] VOC, Total \geq 90 % reduction based on mass emission rate from individual process vent streams in aggregate within a batch process. For the pool of non-exempt batch process vents (C-251, C-301, C-201, and C-603), per LAC 33:III.2149.C.2.a, overall 90% control is achieved by controlling only C-251 and C-301 with greater than 99% efficiency. Use the RACT equation specified in LAC 33:III.2149.C.1 as applicable.
[LAC 33:III.2149.C.1, LAC 33:III.2149.C.2.f]
Which Months: All Year Statistical Basis: None specified
- 160 [LAC 33:III.2149.G.1.b] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

EQT 0061 C-615 - C-615, TARS RECEIVER C-615

- 161 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 162 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0062 C-645 - C-645, PMDB RECEIVER C-645

- 163 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 164 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0063 C-651 - C-651, PC RECEIVER C-651

- 165 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 166 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0064 C-655 - C-655, GUAIACOL LT. ENDS RECEIVER C-655

- 167 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 168 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

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EQT 0065 C-660 - C-660, INTERS./VERATROLE RECEIVER C-660

- 169 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
170 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0066 C-665 - C-665, SECOND RECEIVER C-665

- 171 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
172 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0067 C-670 - C-670, END OF CAMPAIGN RECEIVER C-670

- 173 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
174 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0068 C-675 - C-675, GUAIACOL RECEIVER C-675

- 175 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
176 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0069 C-701 - C-701, CRUDE VERATROLE WASH TANK C-701

- 177 [LAC 33:III.2149.G.1.b] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

EQT 0070 C-705 - C-705, WATER GUAIACOLATE RECEIVER C-705

- 178 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
179 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0071 C-710 - C-710, CAUSTIC WASH RECEIVER C-710

- 180 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
181 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0072 C-751 - C-751, VERATROLE DISTILLATION KETTLE C-751

- 182 [LAC 33:III.2149.G.1.b] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

EQT 0073 C-765 - C-765, LT. ENDS RECEIVER C-765

- 183 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
184 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0074 C-770 - C-770, DISTILLED VERATROLE RECEIVER C-770

- 185 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
186 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0075 203 - 203, BAGHOUSE FOR HQ HANDLING

- 187 [LAC 33:III.1305] Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7.
188 [LAC 33:III.501.C.6] Particulate matter (10 microns or less): Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III.Chapter 13. STATE ONLY.
189 [LAC 33:III.501.C.6] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this baghouse. Determined to be MACT. STATE ONLY.

EQT 0076 301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)

- 190 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
191 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified
Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
192 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all organic contents and washed or (2) have minimal (e.g., breathing loss) emissions which have been included in the permit emissions limits.
193 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
194 [LAC 33:III.501.C.6] Flow rate ≥ 0.46 gallons/min. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0076 301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)

- 195 [LAC 33:III.501.C.6] For up to 70 hours per year, if/when scrubber becomes plugged during normal operation, scrubber water temperature will be increased to remove pluggage and restore proper operation. STATE ONLY.
- 196 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs for which site-wide emissions are greater than the MER are emitted from this scrubber. MACT is not required.

EQT 0077 C-223 - C-223, PHENOL DRAIN TANK REACTION SURGE DRUM C-223

- 197 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0078 C-416 - C-416, PREDEPHENOL REFLUX DRUM C-416

- 198 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0079 C-508 - C-508, VERTICAL TAR DILUTER C-508

- 199 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0080 C-530 - C-530, DISTILLATION DRAN TANK C-530

- 200 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0081 C-532 - C-532, TAILS SURGE DRUM C-532

- 201 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0082 302 - 302, OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0082 302 - 302, OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)

- 202 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature \geq 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (scrubber) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
- 203 [LAC 33:III.2115.J.1] Which Months: All Year Statistical Basis: None specified
- 204 [LAC 33:III.2115.J.2] Demonstrate compliance with LAC 33:III.2115 as requested by DEQ.
- 205 [LAC 33:III.2115.K] Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC 33:III.2115.J.2.a through e.
- 206 [LAC 33:III.501.C.6] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain the records specified in LAC 33:III.2115.K.1 through K.3. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
- 207 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS).
- 208 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified
- 209 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all organic contents and washed or (2) emit only breathing losses which have been included in the permit emissions limits (limited to 10 days per year).
- 210 [LAC 33:III.501.C.6] For up to 16 hours per year, if/when scrubber becomes plugged during normal operation, scrubber water temperature will be increased to remove pluggage and restore proper operation.
- 211 [LAC 33:III.5109.A] Flow rate \geq 7.6 gallons/min.
- 212 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: Four-hour average
- 213 [LAC 33:III.5109.A] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on DCS.
- 214 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs for which site-wide emissions are greater than the MER are emitted from this scrubber. MACT is not required.

EQT 0083 C-113 - C-113, PHENOL UNLOADING TANK C-113

- 212 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0084 D-107 - D-107, WASHWATER TANK D-107

- 213 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

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EQT 0084 D-107 - D-107, WASHWATER TANK D-107

- 214 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0085 D-111 - D-111, PHENOL MAKE-UP TANK D-111

- 215 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
216 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0086 D-115 - D-115, WASHWATER/GUAIACOL TANK D-115

- 217 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
218 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0087 D-315 - D-315, RAFFINATE TANK D-315

- 219 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature \geq 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (scrubber) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent (Note: this requirement does not apply if the unit is shut down and D-315 emits only breathing losses [less than 100 lbs in 24 hours]).
Which Months: All Year Statistical Basis: None specified

EQT 0088 D-204 - D-204, RECYCLE PHENOL TANK D-204

- 220 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0089 303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)

- 221 [LAC 33:III.2147.E.4] Equipment/operational data recordkeeping by electronic or hard copy as needed Install, calibrate, maintain and operate monitoring device(s) on scrubber C-402 and/or condenser E-401 as approved by LDEQ Engineering to demonstrate compliance with TRE index limit specified under LAC 33:III.2147.C.2.
222 [LAC 33:III.501.C.6] Flow rate \geq 4.0 gallons/min.
Which Months: All Year Statistical Basis: Four-hour average
223 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

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EQT 0089 303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)

- 224 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency, i.e. four hour block average based on the plant's distribution control system (DCS).
Which Months: All Year Statistical Basis: None specified
- 225 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all organic contents and washed or (2) have their vent line valve closed such that no emissions occur.
- 226 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs for which site-wide emissions are greater than the MER are emitted from this scrubber. MACT is not required.

EQT 0090 C-320 - C-320, IPE STORAGE TANK C-320

- 227 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0091 C-308 - C-308, IPE SETTLER C-308

- 228 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0092 C-311 - C-311, WASHWATER DRUM C-311

- 229 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0093 C-322 - C-322, ETHER DRAIN TANK C-322

- 230 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0094 304 - 304, PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)

- 231 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

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EQT 0094 304 - 304, PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)

- 232 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 233 [LAC 33:III.501.C.6] For up to 16 hours per year, if/when scrubber becomes plugged during normal operation, scrubber water temperature will be increased to remove pluggage and restore proper operation. STATE ONLY.
- 234 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all organic contents and washed or (2) have minimal (e.g., breathing loss) emissions which have been included in the permit emissions limits. STATE ONLY.
- 235 [LAC 33:III.501.C.6] Flow rate ≥ 0.22 gallons/min. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 236 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 237 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

EQT 0095 C-551 - C-551, PC RECEIVING DRUM C-551

- 238 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0096 C-563 - C-563, PC FLAKER FEED TANK C-563

- 239 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0097 306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)

- 240 [LAC 33:III.2115.K.4] Maintain records to demonstrate that each vent routed to the seal pot is less than 100 lbs/24-hour period. [LAC 33:III.2115.K.4, LAC 33:III.2115.H.1.c]

EQT 0098 C-650 - C-650, REFLUX SURGE DRUM C-650

- 241 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

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EQT 0099 D-607 - D-607, HQ DISSOLVER TANK D-607

- 242 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0100 D-610 - D-610, HQ SURGE TANK D-610

- 243 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0101 D-612 - D-612, CARBON TREATER TANK D-612

- 244 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0102 D-632 - D-632, CRYSTALLIZATION TANK D-632

- 245 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0103 D-652 - D-652, MOTHER LIQUOR SURGE TANK D-652

- 246 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0104 D-653 - D-653, CONC. COLUMN FEED TANK D-653

- 247 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0105 D-657 - D-657, MOTHER LIQUOR SURGE DRUM D-657

- 248 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0106 307 - 307, SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601

- 249 [LAC 33:III.501.C.6] Particulate matter (10 microns or less): Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III.Chapter 13. STATE ONLY.

EQT 0107 308 - 308, OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)

- 250 [LAC 33:III.1311.B] Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.
- 251 [LAC 33:III.501.C.6] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this source. Determined to be MACT. STATE ONLY.

EQT 0109 310 - 310, CARBON BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)

- 252 [LAC 33:III.1311.B] Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.

EQT 0110 311 - 311, PC PACKAGING BAGHOUSE Y-731 (P&I.D. F703)

- 253 [LAC 33:III.1311.B] Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.

EQT 0111 312 - 312, HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)

- 254 [LAC 33:III.1311.B] Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.
- 255 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this source. MACT is not required.

EQT 0112 313 - 313, HQ REWORK DUMPER BAGHOUSE S-693 FOR D607 (P&I.D. F602)

- 256 [LAC 33:III.1311.B] Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.
- 257 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this source. MACT is not required.

EQT 0113 315A - 315A, FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)

- 258 [LAC 33:III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0113 315A - 315A, FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)

- 259 [LAC 33:III.1313.C] Total suspended particulate ≤ 0.6 lb/MMBTU of heat input.
Which Months: All Year Statistical Basis: None specified
- 260 [LAC 33:III.1513] Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request.

EQT 0114 315B - 315B, PRIMARY FLUID HEATER F-971 (P&I.D. F925)

- 261 [LAC 33:III.1101.B] Opacity ≤ 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified
- 262 [LAC 33:III.1313.C] Total suspended particulate ≤ 0.6 lb/MMBTU of heat input.
Which Months: All Year Statistical Basis: None specified
- 263 [LAC 33:III.1513] Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request.

EQT 0116 317 - 317, VACUUM CLEAN-UP PACKAGING BAGHOUSE Y-760X (P&I.D. F703)

- 264 [LAC 33:III.1311.B] Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.

EQT 0118 401A - 401A, WWT TANK NO. 28 (P&I.D. F101)

- 265 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 266 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 267 [LAC 33:III.2153.F.1] Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC 33:III.2153.F.1, LAC 33:III.2153.G]

EQT 0119 401B - 401B, STORMWATER TANK NO. 29 (P&I.D. F101)

- 268 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 269 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 270 [LAC 33:III.2153.F.1] Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC 33:III.2153.F.1, LAC 33:III.2153.G]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0120 401C - 401C, TANK D-197

- 271 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 272 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 273 [LAC 33:III.2153.F.1] Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC 33:III.2153.F.1, LAC 33:III.2153.G]

EQT 0121 402A - 402A, WEST AERATION BASIN D210

- 274 [LAC 33:III.2153.F.1] Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC 33:III.2153.F.1, LAC 33:III.2153.G]

EQT 0122 402B - 402B, EAST AERATION BASIN D213 (P&I.D. F201)

- 275 [LAC 33:III.2153.F.1] Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC 33:III.2153.F.1, LAC 33:III.2153.G]

EQT 0123 402C - 402C, WEST CLARIFIER D301 (P&I.D. F302)

- 276 [LAC 33:III.2153.F.1] Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC 33:III.2153.F.1, LAC 33:III.2153.G]

EQT 0124 402D - 402D, EAST CLARIFIER D304 (P&I.D. F302)

- 277 [LAC 33:III.2153.F.1] Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC 33:III.2153.F.1, LAC 33:III.2153.G]

EQT 0125 M-5 - M-5, CATHY (E925) AND VANESSA (E907) COOLING TOWERS (P&I.D. F903)

- 278 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No additional controls are required.

EQT 0127 C-101 - C-101, IPE SOLVENT STORAGE TANK C-101

- 279 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors (combustion). All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 280 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20100003
Permit Number: 2184-V2
Air - Title V Regular Permit Renewal

EQT 0127 C-101 - C-101, IPE SOLVENT STORAGE TANK C-101

- 281 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

EQT 0128 C-351 - C-351, RAG LAYER DIVERTING TANK C-351

- 282 [LAC 33:III.2149.G.1.b] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.
- 283 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

EQT 0129 C-401 - C-401, AQUEOUS PHASE SURGE TANK C-401

- 284 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors (combustion). All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 285 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 286 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

EQT 0130 C-352 - C-352, RAG LAYER SURGE TANK C-352

- 287 [LAC 33:III.2103.A] Equip with submerged fill pipe.
- 288 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 289 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

EQT 0131 C-461 - C-461, AQUEOUS EFFLUENT TANK C-461

- 290 [LAC 33:III.2103.A] Equip with submerged fill pipe.
- 291 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 292 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

EQT 0132 C-521 - C-521, ORGANIC PHASE SURGE TANK C-521

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0132 C-521 - C-521, ORGANIC PHASE SURGE TANK C-521

- 293 [LAC 33:III.2103.A] Equip with submerged fill pipe.
- 294 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 295 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

EQT 0133 C-132 - C-132, MeCl STORAGE TANK C-132

- 296 [LAC 33:III.2103.A] Equip with submerged fill pipe.
- 297 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 298 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

EQT 0134 C-136 - C-136, EtCl STORAGE TANK C-136

- 299 [LAC 33:III.2103.A] Equip with submerged fill pipe.
- 300 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 301 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

EQT 0135 C-301 - C-301, ACIDIFICATION/DECANTATION TANK C-301

- 302 [LAC 33:III.2149.C.1] VOC, Total $\geq 90\%$ reduction based on mass emission rate from individual process vent streams in aggregate within a batch process. For the pool of non-exempt batch process vents (C-251, C-301, C-201, and C-603), per LAC 33:III.2149.C.2.a, overall 90% control is achieved by controlling only C-251 and C-301 with greater than 99% efficiency. Use the RACT equation specified in LAC 33:III.2149.C.1 as applicable. [LAC 33:III.2149.C.1, LAC 33:III.2149.C.2.f]
Which Months: All Year Statistical Basis: None specified
- 303 [LAC 33:III.2149.G.1.b] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.
- 304 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

EQT 0136 C-503 - C-503, DEETHERATION IPE DECANter C-503

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0136 C-503 - C-503, DEETHERATION IPE DECANter C-503

- 305 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature \geq 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (combustion) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
- 306 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified
Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

EQT 0137 D-681 - D-681, SCREENER RESIDUE DISSOLVER D-681

- 307 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0139 110 - 110, HIGH PURITY PC MIXING VESSEL

- 308 [LAC 33:III.2115.K.4] Maintain records to demonstrate that the criteria are being met for any exemption claimed.

EQT 0188 C-202 - Premixing Reactor

- 309 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0189 C-207 - Veratrole Stripper

- 310 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0190 C-217 - No. 1 Condensation Reactor

- 311 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0191 C-219 - No. 2 Condensation Reactor

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0191 C-219 - No. 2 Condensation Reactor

312 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0192 C-221 - No. 3 Condensation Reactor

313 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0193 C-223 - No. 4 Condensation Reactor

314 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0194 C-225 - No. 5 Condensation Reactor

315 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0195 C-227 - Polishing Reactor

316 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0196 C-241 - Guaiacol Extraction Column

317 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0197 C-245 - Solvent 1 Washing Column

318 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0198 C-301 - Guaiacol Recovery Column

319 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0199 C-306 - Guaiacol/Tars Separator

320 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0200 C-312 - Solvent 1Stripper Decanter

321 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0201 C-314 - Solvent 1Stripper

322 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0202 C-316 - Solvent 1 Cold Trap

323 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0203 C-320 - Guaiacol Distillation Reflux Drum

324 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0204 C-322X - Solvent 1 Vacuum Package Separator

325 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0205 H-317 - Vacuum System

- 326 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0206 C-407 - Oxidation Reactor

- 327 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0207 C-416 - Oxidation Column

- 328 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0208 C-429 - CO2 Separator

- 329 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature \geq 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (condenser/scrubber in series) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
- 330 [LAC 33:III.2115.J.1] Which Months: All Year Statistical Basis: None specified
- 331 [LAC 33:III.2115.J.2] Demonstrate compliance with LAC 33:III.2115 as requested by DEQ.
- 331 [LAC 33:III.2115.J.2] Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC 33:III.2115.J.2.a through e.
- 332 [LAC 33:III.2115.K.4] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Exempt from LAC 33:III.2115 when oxidation reaction section is shutdown. Maintain the records specified in LAC 33:III.2115.K.4. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0209 C-435 - Vanillin Extraction Column

- 333 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0210 C-441 - Solvent 2 Washing Column

- 334 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0211 C-504 - Vanillin/Solvent 2 Atm. Distillation Column

- 335 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0212 C-507 - Vanillin/Solvent 2 Vacuum Distillation Column

- 336 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0213 C-516 - Solvent 2 Cold Trap

- 337 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0214 C-533X - Solvent 2 Vacuum Package Separator

- 338 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0215 C-565 - Solvent 2 Recovery Column (Aqueous Phase Stripper)

- 339 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0216 C-568 - Solvent 2 Recovery Column (Top Rectification)

- 340 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0217 E-428 - Condenser

- 341 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature \geq 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (condenser/scrubber in series) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
- 342 [LAC 33:III.2115.J.1] Which Months: All Year Statistical Basis: None specified
- 343 [LAC 33:III.2115.J.2] Demonstrate compliance with LAC 33:III.2115 as requested by DEQ.
- 344 [LAC 33:III.2115.K.4] Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC 33:III.2115.J.2.a through e.
- Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Exempt from LAC 33:III.2115 when oxidation reaction section is shutdown. Maintain the records specified in LAC 33:III.2115.K.4. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0218 H-520 - Vacuum System

- 345 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0219 C-525 - Tars Removal Column

- 346 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0220 C-525 - Tars By-Pass Tank

- 347 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0221 C-545 - Lights Removal Column

- 348 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0222 C-555A/B - Vanillin Cold Traps

- 349 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0223 C-562X - Vanillin Purification Vacuum Package Separator

- 350 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0224 H-556 - Vacuum System

- 351 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0225 C-634X - Dryer Scrubber

- 352 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0226 C-637X - Crystallization Vacuum Package Separator

- 353 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0227 C-640 - Dryer

- 354 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0228 C-805 - Solvent 3 Recovery Column

- 355 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0229 H-619 - Vacuum System

356 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0230 Y-620 - Centrifuge A

357 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0231 Y-621 - Centrifuge B

358 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0232 Y-640 - Dryer

359 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0233 C-606 - Guaiacol Distillation Column

360 [LAC 33:III.2149.G.1.b] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

EQT 0234 C-683X - Guaiacol Vacuum Package Separator

361 [LAC 33:III.2149.G.1.b] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

EQT 0235 C-687A/B - Guaiacol Distillation Cold Traps

362 [LAC 33:III.2149.G.1.b] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

EQT 0236 C-754 - Veratrole Distillation Column

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0236 C-754 - Veratrole Distillation Column

- 363 [LAC 33:III.2149.G.1.b] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

EQT 0237 C-783X - Veratrole Vacuum Separator

- 364 [LAC 33:III.2149.G.1.b] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

EQT 0238 C-787 - Veratrole Distillation Cold Traps

- 365 [LAC 33:III.2149.G.1.b] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

EQT 0239 C-213 - First Reactor

- 366 [LAC 33:III.2147.C.2] Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. Calculate the TRE index at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5 TRE index value ≥ 1 (no units) without the use of volatile organic compound emission control device and with or without the use of one or more recovery devices. Calculate the TRE index value at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5.
Which Months: All Year Statistical Basis: None specified
- 367 [LAC 33:III.2147.D.7] Recalculate the flow rate, TOC concentration, and TRE index value within two weeks of any process change that could effect a change in one or more of these vent stream parameters. Use the methods and procedures of LAC 33:III.2147 for the recalculations.
- 368 [LAC 33:III.2147.F] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2147.F.1 through F.4, as applicable.

EQT 0246 E-418 - Phenol Condenser

- 369 [LAC 33:III.2147.C.2] Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. Calculate the TRE index at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5 TRE index value ≥ 1 (no units) without the use of volatile organic compound emission control device and with or without the use of one or more recovery devices. Calculate the TRE index value at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0246 E-418 - Phenol Condenser

- 370 [LAC 33:III.2147.D.7] Recalculate the flow rate, TOC concentration, and TRE index value within two weeks of any process change that could effect a change in one or more of these vent stream parameters. Use the methods and procedures of LAC 33:III.2147 for the recalculations.
- 371 [LAC 33:III.2147.F] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2147.F.1 through F.4, as applicable.

EQT 0247 H-524 - Vacuum System

- 372 [LAC 33:III.2147.C.2] Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. Calculate the TRE index at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5 TRE index value ≥ 1 (no units) without the use of volatile organic compound emission control device and with or without the use of one or more recovery devices. Calculate the TRE index value at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5.
Which Months: All Year Statistical Basis: None specified
- 373 [LAC 33:III.2147.D.7] Recalculate the flow rate, TOC concentration, and TRE index value within two weeks of any process change that could effect a change in one or more of these vent stream parameters. Use the methods and procedures of LAC 33:III.2147 for the recalculations.
- 374 [LAC 33:III.2147.F] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2147.F.1 through F.4, as applicable.

EQT 0251 E-401 - Solvent Vent Condenser

- 375 [LAC 33:III.2147.C.2] Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. Calculate the TRE index at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5 TRE index value ≥ 1 (no units) without the use of volatile organic compound emission control device and with or without the use of one or more recovery devices. Calculate the TRE index value at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5.
Which Months: All Year Statistical Basis: None specified
- 376 [LAC 33:III.2147.D.7] Recalculate the flow rate, TOC concentration, and TRE index value within two weeks of any process change that could effect a change in one or more of these vent stream parameters. Use the methods and procedures of LAC 33:III.2147 for the recalculations.
- 377 [LAC 33:III.2147.F] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2147.F.1 through F.4, as applicable.
- 378 [LAC 33:III.501.C.6] The condenser is equipped with a high temperature alarm. The maximum temperature of the water supplied to the condenser shall be maintained at 13 degrees Celsius based on a four hour average.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0251 E-401 - Solvent Vent Condenser

- 379 [LAC 33:III.501.C.6] Condenser must operate at all times unless the unit is not in operation and the vessels normally vented to the condenser (1) have been emptied of all organic contents and washed or (2) have their vent line valve closed such that no emissions occur.

EQT 0253 H-545 - Vacuum System

- 380 [LAC 33:III.2147.C.2] Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. Calculate the TRE index at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5 TRE index value ≥ 1 (no units) without the use of volatile organic compound emission control device and with or without the use of one or more recovery devices. Calculate the TRE index value at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5.
- 381 [LAC 33:III.2147.D.7] Which Months: All Year Statistical Basis: None specified
Recalculate the flow rate, TOC concentration, and TRE index value within two weeks of any process change that could effect a change in one or more of these vent stream parameters. Use the methods and procedures of LAC 33:III.2147 for the recalculations.
- 382 [LAC 33:III.2147.F] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2147.F.1 through F.4, as applicable.

EQT 0254 S-560 - PC Flaker

- 383 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0255 C-251 - Batch Reactor

- 384 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
- 385 [LAC 33:III.2149.C.1] VOC, Total ≥ 90 % reduction based on mass emission rate from individual process vent streams in aggregate within a batch process. For the pool of non-exempt batch process vents (C-251, C-301, C-201, and C-603), per LAC 33:III.2149.C.2.a, overall 90% control is achieved by controlling only C-251 and C-301 with greater than 99% efficiency. Use the RACT equation specified in LAC 33:III.2149.C.1 as applicable. [LAC 33:III.2149.C.1, LAC 33:III.2149.C.2.f]
- 386 [LAC 33:III.2149.G.1.b] Which Months: All Year Statistical Basis: None specified
Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.
- 387 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0256 H-640 - Vacuum System for Crystallizers

- 388 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0257 C-451 - Extraction Column

- 389 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature \geq 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (combustion) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
Which Months: All Year Statistical Basis: None specified
- 390 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

EQT 0258 C-501 - Detheration Column

- 391 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature \geq 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (combustion) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
Which Months: All Year Statistical Basis: None specified
- 392 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

EQT 0259 C-511 - Detheration Guaiacol Decanter

- 393 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature \geq 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (combustion) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
Which Months: All Year Statistical Basis: None specified
- 394 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

EQT 0260 C-551 - Crude Guaiacol Dehydration Column

- 395 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature \geq 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (combustion) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0260 C-551 - Crude Guaiacol Dehydration Column

396 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

EQT 0261 C-555 - Wet Guaiacol Tank

397 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
398 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
399 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

EQT 0288 M-9 - Emergency Diesel Generator for Daphne/Vanessa Sump

400 [40 CFR 63.6595(a)(1)] 40 CFR 63 Subpart ZZZZ requirements become effective May 3, 2013. [40 CFR 63.6595(a)(1)]
401 [40 CFR 63.6603(a)] Equipment/operational data monitored by visual inspection/determination annually or every 1,000 hours of operation, whichever comes first. Inspect air cleaner. Subpart ZZZZ. [40 CFR 63.6603(a)]
Which Months: All Year Statistical Basis: None specified
402 [40 CFR 63.6603(a)] Equipment/operational data monitored by visual inspection/determination annually or every 500 hours of operation, whichever comes first. Inspect all hoses and belts, and replace as necessary. Subpart ZZZZ. [40 CFR 63.6603(a)]
Which Months: All Year Statistical Basis: None specified
403 [40 CFR 63.6603(a)] Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. Subpart ZZZZ. [40 CFR 63.6603(a), 40 CFR 63.6625(h)]
404 [40 CFR 63.6603(a)] Change oil and filter every 500 hours of operation or annually, whichever comes first. Subpart ZZZZ. [40 CFR 63.6603(a)]
405 [40 CFR 63.6605(a)] Be in compliance with emission limitations and operating limitations in 40 CFR 63 Subpart ZZZZ at all times. Subpart ZZZZ. [40 CFR 63.6605(a)]
406 [40 CFR 63.6605(b)] Operate and maintain at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6605(b)]
407 [40 CFR 63.6625(e)] Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6625(e)]
408 [40 CFR 63.6625(f)] Install a non-resettable hour meter. Subpart ZZZZ. [40 CFR 63.6625(f)]
409 [40 CFR 63.6640(a)] Demonstrate continuous compliance with each applicable emission limitation and operating limitation in 40 CFR 63 Subpart ZZZZ Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d according to methods specified in 40 CFR 63 Subpart ZZZZ Table 6. Subpart ZZZZ. [40 CFR 63.6640(a)]
410 [40 CFR 63.6640(f)(1)ii] Operate for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Limit maintenance checks and readiness testing to 100 hours per year. Subpart ZZZZ. [40 CFR 63.6640(f)(1)ii]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0288 M-9 - Emergency Diesel Generator for Daphne/Vanessa Sump

- 411 [40 CFR 63.6640(f)(1)iii] Operate up to 50 hours per year in non-emergency situations, but count those 50 hours towards the 100 hours per year provided for maintenance and testing. Do not use the 50 hours per year for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that the emergency engine may be operated for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. Do not operate for more than 30 minutes prior to the time when the emergency condition is expected to occur, and terminate the engine operation immediately after the facility is notified that the emergency condition is no longer imminent. Count the 15 hours per year of demand response operation as part of the 50 hours of operation per year provided for non-emergency situations. Subpart ZZZZ. [40 CFR 63.6640(f)(1)iii]
- 412 [40 CFR 63.6655] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.6655(a) through (f), as applicable. Subpart ZZZZ.
- 413 [LAC 33:III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
- 414 [LAC 33:III.1311.C] Which Months: All Year Statistical Basis: None specified
Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: Six-minute average

EQT 0289 E-318 - Predephenoling Vent Condenser

- 415 [LAC 33:III.501.C.6] Condenser must operate at all times unless the unit is not in operation and the vessels normally vented to the condenser (1) have been emptied of all organic contents and washed or (2) emit only breathing losses which have been included in the permit emissions limits (limited to 10 days per year if downstream scrubber is also off).
- 416 [LAC 33:III.501.C.6] The condenser is equipped with a high temperature alarm. The maximum temperature of the water supplied to the condenser shall be maintained at 13 degrees Celsius based on a four hour average.

FUG 0001 F-6V - F-6V, VANESSA FUGITIVE EMISSIONS

- 417 [LAC 33:III.2111] Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment.
- 418 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this source. MACT is not required.

FUG 0004 F-6C - F-6C, CATHY FUGITIVE EMISSIONS

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

FUG 0004 F-6C - F-6C, CATHY FUGITIVE EMISSIONS

- 419 [LAC 33:III.2111] Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment.
- 420 [LAC 33:III.2122.C.1.c] Repair according to LAC 33:III.2122.C.3 any regulated component observed leaking by sight, sound, or smell, regardless of the leak's concentration, except those covered under LAC 33:III.2122.C.1.d.
- 421 [LAC 33:III.2122.C.1.d] Pumps and valves in heavy liquid service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 within 5 days if observed leaking by sight, sound, or smell. Repair according to LAC 33:III.2122.C.3 if the pump or valve is determined to be leaking in excess of the applicable limits given in LAC 33:III.2122.
Which Months: All Year Statistical Basis: None specified
- 422 [LAC 33:III.2122.C.2] Do not locate any valve, except safety pressure relief valves, at the end of a pipe or line containing volatile organic compounds unless the end of such line is sealed with a second valve, a blind flange, a plug, or a cap. Remove such sealing devices only when the line is in use, for example, when a sample is being taken. When the line has been used and is subsequently resealed, close the upstream valve first, followed by the sealing device.
- 423 [LAC 33:III.2122.C.3] Make every reasonable effort to repair a leaking component, as described in LAC 33:III.2122, within 15 days, except as provided.
- 424 [LAC 33:III.2122.C.4] Determine the percent of leaking components at a process unit for a test period using the equation in LAC 33:III.2122.C.4.
- 425 [LAC 33:III.2122.C.5] Determine the total percent of leaking and unrepairable components using the equation in LAC 33:III.2122.C.5.
- 426 [LAC 33:III.2122.D.1.a] Process drains: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 annually (one time per year). If a reading of 1,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3.
Which Months: All Year Statistical Basis: None specified
- 427 [LAC 33:III.2122.D.1.b.i] Compressor seals: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 5,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3.
Which Months: All Year Statistical Basis: None specified
- 428 [LAC 33:III.2122.D.1.b.ii] Pressure relief valves in gas service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 1,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3.
Which Months: All Year Statistical Basis: None specified
- 429 [LAC 33:III.2122.D.1.b.iii] Valves in light liquid service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 1,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3. Permittee may elect to comply with the alternate standards for valves in LAC 33:III.2122.E (skip period provisions).
Which Months: All Year Statistical Basis: None specified
- 430 [LAC 33:III.2122.D.1.b.iv] Pumps in light liquid service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 5,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3.
Which Months: All Year Statistical Basis: None specified
- 431 [LAC 33:III.2122.D.1.b.v] Valves in gas service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 1,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3. Permittee may elect to comply with the alternate standards for valves in LAC 33:III.2122.E (skip period provisions).
Which Months: All Year Statistical Basis: None specified
- 432 [LAC 33:III.2122.D.1.c] Pumps: Seal or closure mechanism monitored by visual inspection/determination weekly (52 times a year).
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

FUG 0004 F-6C - F-6C, CATHY FUGITIVE EMISSIONS

- 433 [LAC 33:III.2122.D.1.d.i] Flanged connectors: Presence of a leak monitored by visual, audible, and/or olfactory weekly.
Which Months: All Year Statistical Basis: None specified
- 434 [LAC 33:III.2122.D.1.e] Instrumentation systems: Presence of a leak monitored by visual, audible, and/or olfactory weekly.
Which Months: All Year Statistical Basis: None specified
- 435 [LAC 33:III.2122.D.3.a] Pressure relief valves: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 within 24 hours after venting to the atmosphere. If a reading of 1,000 ppmv or greater (for petroleum refineries, SOCM, MTBE, and polymer manufacturing industry) or 2,500 ppmv or greater (for natural gas processing plants) is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3.
Which Months: All Year Statistical Basis: None specified
- 436 [LAC 33:III.2122.D.3.b] All components: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 upon each occurrence of a leak detected by sight, smell, or sound, unless electing to implement actions as specified in LAC 33:III.2122.C.3.
Which Months: All Year Statistical Basis: None specified
- 437 [LAC 33:III.2122.D.3.c] Inaccessible valves: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 annually (at a minimum).
Which Months: All Year Statistical Basis: None specified
- 438 [LAC 33:III.2122.D.3.d] Unsafe-to-monitor valves: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 upon each occurrence of conditions allowing these valves to be monitored safely.
Which Months: All Year Statistical Basis: None specified
- 439 [LAC 33:III.2122.F.1] When a component which has a leak that cannot be repaired, as described in LAC 33:III.2122.C, is located, affix to the leaking component a weatherproof and readily visible tag bearing an identification number and the date the leak is located. Remove the tag after the leak has been repaired.
- 440 [LAC 33:III.2122.F] Equipment/operational data recordkeeping by survey log upon each occurrence of a leak. Include the leaking component information specified in LAC 33:III.2122.F.2.a through j. Retain the survey log for two years after the latter date specified in LAC 33:III.2122.F.2 and make said log available to DEQ upon request.
- 441 [LAC 33:III.2122.G] Submit report: Due semiannually, by the 31st of January and July, to the Office of Environmental Assessment, Environmental Technology Division. Include the information specified in LAC 33:III.2122.G.1 through 6 for each calendar quarter during the reporting period.

FUG 0005 F-6D - F-6D, DAPHNE FUGITIVE EMISSIONS

- 442 [LAC 33:III.2111] Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment.
- 443 [LAC 33:III.2122] LAC 33:III.2122 applies only if/when anisole is produced. Rhodia will implement a fugitive monitoring program per LAC 33:III.2122 prior to startup of anisole campaign.

GRP 0006 - Cathy

Group Members: EQT 0076EQT 0077EQT 0078EQT 0079EQT 0100EQT 0101EQT 0102EQT 0103EQT 0104EQT 0105EQT 0106EQT 0107EQT 0109EQT 0110EQT 0111EQT 0112EQT 0113EQT 0114EQT 0115EQT 0116EQT 0137EQT 0139EQT 0239EQT 0240EQT 0241EQT 0242EQT 0243EQT 0244EQT 0245EQT 0246EQT 0247EQT 0248EQT 0249EQT 0250EQT 0251EQT 0252EQT 0253EQT 0254EQT 0256FUG 0004EQT 0080EQT 0081EQT 0083EQT 0084EQT 0085EQT 0086EQT 0087EQT 0088EQT 0090EQT 0091EQT 0092EQT 0093EQT 0095EQT 0096EQT 0098EQT 0099

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

GRP 0006 - Cathy

- 444 [LAC 33:III.2147.F] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2147.F.1 through F.4, as applicable.

GRP 0014 WWT - EMISSIONS CAP - WW TREATMENT PLANT

Group Members: EQT 0118EQT 0119EQT 0120EQT 0121EQT 0122EQT 0123EQT 0124

- 445 [LAC 33:III.2153.F.1] Maintain records to demonstrate that the annual VOC loading in wastewater is less than or equal to 10 Mg (11.03 tons).

GRP 0022 Fire Pump Diesel Engines - Fire Pump Diesel Engines

Group Members: EQT 0286EQT 0287

- 446 [40 CFR 63.6595(a)(1)] 40 CFR 63 Subpart ZZZZ requirements become effective May 3, 2013. [40 CFR 63.6595(a)(1)]
- 447 [40 CFR 63.6603(a)] Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. Subpart ZZZZ. [40 CFR 63.6603(a), 40 CFR 63.6625(h)]
- 448 [40 CFR 63.6603(a)] Change oil and filter every 500 hours of operation or annually, whichever comes first. Subpart ZZZZ. [40 CFR 63.6603(a)]
- 449 [40 CFR 63.6603(a)] Equipment/operational data monitored by visual inspection/determination annually or every 500 hours of operation, whichever comes first. Inspect all hoses and belts, and replace as necessary. Subpart ZZZZ. [40 CFR 63.6603(a)]
Which Months: All Year Statistical Basis: None specified
- 450 [40 CFR 63.6603(a)] Equipment/operational data monitored by visual inspection/determination annually or every 1,000 hours of operation, whichever comes first. Inspect air cleaner. Subpart ZZZZ. [40 CFR 63.6603(a)]
Which Months: All Year Statistical Basis: None specified
- 451 [40 CFR 63.6605(a)] Be in compliance with emission limitations and operating limitations in 40 CFR 63 Subpart ZZZZ at all times. Subpart ZZZZ. [40 CFR 63.6605(a)]
- 452 [40 CFR 63.6605(b)] Operate and maintain at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6605(b)]
- 453 [40 CFR 63.6625(e)] Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6625(e)]
- 454 [40 CFR 63.6625(f)] Install a non-resettable hour meter. Subpart ZZZZ. [40 CFR 63.6625(f)]
- 455 [40 CFR 63.6640(a)] Demonstrate continuous compliance with each applicable emission limitation and operating limitation in 40 CFR 63 Subpart ZZZZ Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d according to methods specified in 40 CFR 63 Subpart ZZZZ Table 6. Subpart ZZZZ. [40 CFR 63.6640(a)]
- 456 [40 CFR 63.6640(f)(1)ii] Operate for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Limit maintenance checks and readiness testing to 100 hours per year. Subpart ZZZZ. [40 CFR 63.6640(f)(1)ii]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

GRP 0022 Fire Pump Diesel Engines - Fire Pump Diesel Engines

- 457 [40 CFR 63.6640(f)(1)iii] Operate up to 50 hours per year in non-emergency situations, but count those 50 hours towards the 100 hours per year provided for maintenance and testing. Do not use the 50 hours per year for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that the emergency engine may be operated for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. Do not operate for more than 30 minutes prior to the time when the emergency condition is expected to occur, and terminate the engine operation immediately after the facility is notified that the emergency condition is no longer imminent. Count the 15 hours per year of demand response operation as part of the 50 hours of operation per year provided for non-emergency situations. Subpart ZZZZ. [40 CFR 63.6640(f)(1)iii]
- 458 [40 CFR 63.6655] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.6655(a) through (f), as applicable. Subpart ZZZZ.
- 459 [LAC 33:III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified
- 460 [LAC 33:III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: Six-minute average

UNF 0001 - Cathyval Plant

- 461 [40 CFR 60.] All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.
- 462 [40 CFR 61.145(b)(1)] Provide DEQ with written notice of intention to demolish or renovate prior to performing activities to which 40 CFR 61 Subpart M applies. Delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery is acceptable. [40 CFR 61.145(b)(1)]
- 463 [40 CFR 61.148] Do not install or reinstall on a facility component any insulating materials that contain commercial asbestos if the materials are either molded and friable or wet-applied and friable after drying. Subpart M.
- 464 [40 CFR 63.] All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A as delineated in Table 8 of 40 CFR 63 Subpart ZZZZ.
- 465 [40 CFR 68.150] Submit Risk Management Plan (RMP): Due no later than June 21, 1999, or three years after the date on which a regulated substance is first listed under 68.130, or the date on which a regulated substance is first present above a threshold quantity in a process. Submit in a method and format to a central point as specified by EPA prior to June 21, 1999.
- 466 [40 CFR 68.155] Provide in the RMP an executive summary that includes a brief description of the elements listed in 68.155(a) through (f).
- 467 [40 CFR 68.160] Complete a single registration form and include in the RMP. Cover all regulated substances handled in covered processes. Include in the registration the information specified in 68.160(b)(1) through (20).
- 468 [40 CFR 68.165] Submit in the RMP information the release scenarios specified in 68.165(a)(2). Include the data listed in 68.165(b)(1) through (14).
- 469 [40 CFR 68.168] Submit in the RMP the information provided in 68.42(b) on each accident covered by 68.42(a).

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

UNF 0001 - Cathyval Plant

- 470 [40 CFR 68.175] Provide in the RMP the information indicated in 68.175(b) through (p).
- 471 [40 CFR 68.180] Provide in the RMP the emergency response information listed in 68.180(a) through (c).
- 472 [40 CFR 68.185(b)] Submit in the RMP a single certification that, to the best of the signer's knowledge, information, and belief formed after reasonable inquiry, the information submitted is true, accurate, and complete. [40 CFR 68.185(b)]
- 473 [40 CFR 68.190(c)] Submit revised registration to EPA: Due within six months after a stationary source is no longer subject to 40 CFR 68. Indicate that the stationary source is no longer covered. [40 CFR 68.190(c)]
- 474 [40 CFR 68.190] Review and update the RMP as specified in 68.190(b) and submit it in a method and format to a central point specified by EPA prior to June 21, 1999.
- 475 [40 CFR 68.200] Maintain records supporting the implementation of 40 CFR 68 for five years unless otherwise provided.
- 476 [40 CFR 68.22] Use the endpoints specified in 68.22(a) through (g) for analyses of offsite consequences.
- 477 [40 CFR 68.25] Analyze the release scenarios in 68.25, as specified in 68.25(a) through (h).
- 478 [40 CFR 68.28] Identify and analyze at least one alternative release scenario for each regulated toxic substance held in a covered process(es) and at least one alternative release scenario to represent all flammable substances held in covered processes, as specified in 68.28(b) through (e).
- 479 [40 CFR 68.30] Estimate in the RMP the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
- 480 [40 CFR 68.33] List in the RMP environmental receptors within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
- 481 [40 CFR 68.36(b)] Submit revised RMP: Due within six months after changes in processes, quantities stored or handled, or any other aspect of the stationary source increase or decrease the distance to the endpoint by a factor of two or more. [40 CFR 68.36(b)]
- 482 [40 CFR 68.36] Review and update the offsite consequence analyses at least once every five years. Complete a revised analysis within six months if changes in processes, quantities stored or handled, or any other aspect of the stationary source might reasonably be expected to increase or decrease the distance to the endpoint by a factor of two or more.
- 483 [40 CFR 68.39] Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain the records specified in 68.39(a) through (e) on the offsite consequence analyses.
- 484 [40 CFR 68.42] Include in the five-year accident history all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage. Include the information specified in 68.42(b)(1) through (11) for each accidental release.
- 485 [40 CFR 68.65(d)(2)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Document that equipment complies with recognized and generally accepted good engineering practices. [40 CFR 68.65(d)(2)]
- 486 [40 CFR 68.65(d)(3)] Determine that existing equipment, designed and constructed in accordance with codes, standards, or practices that are no longer in general use, is designed, maintained, inspected, tested, and operating in a safe manner. [40 CFR 68.65(d)(3)]
- 487 [40 CFR 68.65(d)(3)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Document that existing equipment, designed and constructed in accordance with codes, standards, or practices that are no longer in general use, is designed, maintained, inspected, tested, and operating in a safe manner. [40 CFR 68.65(d)(3)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

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Air - Title V Regular Permit Renewal

UNF 0001 - Cathyval Plant

- 488 [40 CFR 68.67(e)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Document the resolution of the recommendations of the team performing the process hazard analysis, and what actions are to be taken. [40 CFR 68.67(e)]
- 489 [40 CFR 82.Subpart F] Comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B.
- 490 [LAC 33:III.1103] Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited.
- 491 [LAC 33:III.1109.B] Outdoor burning of waste material or other combustible material is prohibited.
- 492 [LAC 33:III.1303.B] Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
- 493 [LAC 33:III.1513] Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request.
- 494 [LAC 33:III.2113.A] Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
- 495 [LAC 33:III.219] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- 496 [LAC 33:III.2901.D] Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
- 497 [LAC 33:III.2901.F] If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.
- 498 [LAC 33:III.501.C.1] Submit permit application: Due prior to construction, reconstruction or modification unless otherwise provided in LAC 33:III.Chapter 5. Submit a timely and complete permit application to the Office of Environmental Services, Permits Division as required in accordance with the procedures in LAC 33:III.Chapter 5.
- 499 [LAC 33:III.507.A.1.a] Any major source as defined in LAC 33:III.502 is designated a Part 70 source and is required to obtain a permit which will meet the requirements of LAC 33:III.507.
- 500 [LAC 33:III.507.E.4] Any permit application to renew an existing permit shall be submitted at least six months prior to the date of permit expiration, or at such earlier time as may be required by the existing permit or approved by the permitting authority. In no event shall the application for permit renewal be submitted more than 18 months before the date of permit expiration.
- 501 [LAC 33:III.509.I.1] No major stationary source or major modification to which the requirements of this Part apply shall begin actual construction without a permit issued under this Section.
- 502 [LAC 33:III.509.J.1] A major stationary source or major modification shall meet each applicable emissions limitation under the Louisiana State Implementation Plan and each applicable emissions standard and standard of performance under the Louisiana New Source Performance Standards (LNSPS) and Louisiana Emission Standards for Hazardous Air Pollutants (LESHAP) and Sections 111 and 112 of the Clean Air Act.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

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- 503 [LAC 33:III.509.J.3] A major modification shall apply best available control technology for each pollutant subject to regulation under this Section which would result in a significant net emissions increase at the source. This requirement applies to each proposed emissions unit at which a net emissions increase in the pollutant would occur as a result of a physical change or change in the method of operation in the unit.
- 504 [LAC 33:III.509.J.4] For phased construction projects, the determination of best available control technology shall be reviewed and modified as appropriate at the latest reasonable time which occurs no later than 18 months prior to commencement of construction of each independent phase of the project. At such time, the owner or operator of the applicable stationary source may be required to demonstrate the adequacy of any previous determination of best available control technology for the source.
- 505 [LAC 33:III.5105.A.1] Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard.
- 506 [LAC 33:III.5105.A.2] Do not cause a violation of any ambient air standard listed in LAC 33:III.Table 51.2, unless operating in accordance with LAC 33:III.5109.
- 507 [LAC 33:III.5105.A.3] Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
- 508 [LAC 33:III.5105.A.4] Do not fail to keep records, notify, report or revise reports as required under LAC 33:III.Chapter 51.Subchapter A.
- 509 [LAC 33:III.5107.A.2] Submit Annual Emissions Report (TEDI): Due annually, by the 1st of July, to the Office of Environmental Assessment, Environmental Evaluation Division in a form specified by the department. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.
- 510 [LAC 33:III.5107.A.3] Include a certification statement with initial and subsequent annual emission reports and revisions to any emission report to attest that the information contained in the emission report is true, accurate, and complete, and signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official. The certification statement shall read: "I certify, under penalty of perjury, that the emissions data provided is accurate to the best of my knowledge, information, and belief, and I understand that submitting false or misleading information will expose me to prosecution under state regulations"
- 511 [LAC 33:III.5107.B.1] Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but no later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere which results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).
- 512 [LAC 33:III.5107.B.2] Submit notification: Due to the Office of Environmental Compliance, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.Chapter 51.Table 51.1 or a reportable quantity (RQ) in LAC 33:I.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:I.3923.
- 513 [LAC 33:III.5107.B.3] Submit notification: Due to the Office of Environmental Compliance immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:I.3931, except as provided in LAC 33:III.5107.B.6. Submit notification in the manner provided in LAC 33:I.3923.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

UNF 0001 - Cathyval Plant

- 514 [LAC 33:III.5107.B.4] Submit written report: Due within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through 3. Submit report to the Office of Environmental Compliance by certified mail. Include the information specified in LAC 33:III.5107.B.4.a.i through viii.
- 515 [LAC 33:III.5107.B.5] Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, in the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
- 516 [LAC 33:III.5109.B.3] Achieve compliance with ambient air standards unless it can be demonstrated to the satisfaction of DEQ that compliance with an ambient air standard would be economically infeasible; that emissions could not reasonably be expected to pose a threat to public health or the environment; and that emissions would be controlled to a level that is Maximum Achievable Control Technology.
- 517 [LAC 33:III.5109.B] Determine the status of compliance, beyond the property line, with applicable ambient air standards listed in LAC 33:III.5112.Table 51.2 for any toxic air pollutant that is emitted or permitted to be emitted at a rate equal to or greater than the minimum emission rate listed for that toxic air pollutant in LAC 33:III.5112. Table 51.1.
- 518 [LAC 33:III.5109.C] Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III.Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by the department.
- 519 [LAC 33:III.5111.A.2.a] Obtain a permit modification in accordance with LAC 33:III.5111.B and C before commencement of any modification not specified in a compliance plan submitted under LAC 33:III.5109.D, if the modification will result in an increase in emissions of any toxic air pollutant or will create a new point source.
- 520 [LAC 33:III.5111.A] Do not commence construction or modification of any major source without first obtaining written authorization from DEQ, as specified.
- 521 [LAC 33:III.5113.B.1] Ensure that all testing done to determine the emission of toxic air pollutants, upon request by the department, is conducted by qualified personnel.
- 522 [LAC 33:III.5113.B.2] Conduct emission tests as set forth in accordance with Test Methods of 40 CFR, parts 60, 61, and 63 or in accordance with alternative test methods approved by DEQ.
- 523 [LAC 33:III.5113.B.3] Provide necessary sampling and testing facilities, exclusive of instruments and sensing devices, as needed to properly determine the emission of toxic air pollutants, upon request of the department.
- 524 [LAC 33:III.5113.B.4] Provide emission testing facilities as specified in LAC 33:III.5113.B.4.a through e.
- 525 [LAC 33:III.5113.B.5] Submit certified letter: Due to the Office of Environmental Assessment, Environmental Technology Division before the close of business on the 45th day following the completion of the emission test. Report the determinations of the emission test.
- 526 [LAC 33:III.5113.B.5] Analyze samples and determine emissions within 30 days after each emission test has been completed.
- 527 [LAC 33:III.5113.B.6] Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of emissions testing. Retain records of emission test results and other data needed to determine emissions. Retained records at the source, or at an alternate location approved by DEQ for a minimum of two years, and make available upon request for inspection by DEQ.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

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Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

UNF 0001 - Cathyval Plant

- 528 [LAC 33:III.5113.B.7] Submit notification: Due to the Office of Environmental Assessment, Environmental Technology Division at least 30 days before the emission test. Submit notification of emission test to allow DEQ the opportunity to have an observer present during the test.
- 529 [LAC 33:III.5113.C.1] Maintain and operate each monitoring system in a manner consistent with good air pollution control practices for minimizing emissions. Repair or adjust any breakdown or malfunction of the monitoring system as soon as practicable after its occurrence.
- 530 [LAC 33:III.5113.C.2] Submit notification in writing: Due to the Office of Environmental Assessment, Environmental Technology Division at least 30 days before a performance evaluation of the monitoring system is to begin.
- 531 [LAC 33:III.5113.C.3] Install a monitoring system on each effluent or on the combined effluent, when monitoring is required and the effluents from a single source, or from two or more sources subject to the same emission standards, are combined before being released to the atmosphere. If two or more sources are not subject to the same emission standards, install a separate monitoring system on each effluent, unless otherwise specified. If the applicable standard is a mass emission standard and the effluent from one source is released to the atmosphere through more than one point, install a monitoring system at each emission point unless DEQ approves the installation of fewer systems.
- 532 [LAC 33:III.5113.C.5.a] Submit report: Due to DEQ within 60 days of the performance evaluation of the CMS, if requested. Furnish DEQ with two or more copies of a written report of the test results within 60 days.
- 533 [LAC 33:III.5113.C.5.d] Install all continuous monitoring systems or monitoring devices to make representative measurements under variable process or operating parameters, if required to install a CMS.
- 534 [LAC 33:III.5113.C.5.e] Collect and reduce all data as specified in LAC 33:III.5113.C.5.e.i and ii, if required to install a CMS.
- 535 [LAC 33:III.5113.C.5] Submit plan: Due to the Office of Environmental Assessment, Environmental Technology Division within 90 days after DEQ requests either the initial plan or an updated plan, if required by DEQ to install a continuous monitoring system. Submit for approval a plan describing the affected sources and the methods for ensuring compliance with the continuous monitoring system.
- 536 [LAC 33:III.5113.C.7] Maintain records of monitoring data, monitoring system calibration checks, and the occurrence and duration of any period during which the monitoring system is malfunctioning or inoperative. Maintain these records at the source, or at an alternative location approved by DEQ, for a minimum of three years and make available, upon request, for inspection by DEQ.
- 537 [LAC 33:III.511] Submit notification: Due to the permitting authority prior to the initiation of any project which will result in emission reductions. Include in the notification a description of the proposed action, a location map, a description of the composition of air contaminants involved, the rate and temperature of the emissions, the identity of the sources involved and the change in emissions. Make any appropriate permit revision reflecting the emission reduction no later than 180 days after commencement of operation and in accordance with the procedures of LAC 33:III.Chapter 5.
- 538 [LAC 33:III.5151.F.1.f] An individual or company contracted to perform a demolition or renovation activity which disturbs RACM must be recognized by the Licensing Board for Contractors to perform asbestos abatement, and shall meet the requirements of LAC 33:III.5151.F.2 and F.3 for each demolition or renovation activity.
- 539 [LAC 33:III.517.A.1] Submit permit application: Due prior to commencement of construction, reconstruction, or modification of the source, for new or modified sources. Do not commence construction, reconstruction, or modification of any source required to be permitted under LAC 33:III.Chapter 5 prior to approval by the permitting authority.
- 540 [LAC 33:III.517.A.2] Submit permit application: Due by the date established for submittal in accordance with LAC 33:III.507.C. The permit application is for an initial permit to be issued in accordance with LAC 33:III.507. Provide a copy of each permit application pertaining to a major Part 70 source to EPA at the time of application submittal to the permitting authority.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

UNF 0001 - Cathyval Plant

- 541 [LAC 33:III.517.D] Submit applications for permits in accordance with forms and guidance provided by the DEQ. At a minimum, each permit application submitted under LAC 33:III.Chapter 5 shall contain the information specified in LAC 33:III.517.D, subparagraphs 1-18.
- 542 [LAC 33:III.5609.A.1.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611.Table 5 when the administrative authority declares an Air Pollution Alert.
- 543 [LAC 33:III.5609.A.3.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611.Table 7 when the administrative authority declares an Air Pollution Emergency.
- 544 [LAC 33:III.5609.A] Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency.
- 545 [LAC 33:III.5611.A] Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611.Tables 5, 6, and 7.
- 546 [LAC 33:III.5611.B] Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by the administrative authority.
- 547 [LAC 33:III.5901.A] During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.
- 548 [LAC 33:III.5907] Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.
- 549 [LAC 33:III.5911.A] Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur.
- 550 [LAC 33:III.5911.C] Submit registration: Due January 31, 1998, or within 60 days after the source becomes subject to LAC 33:III.Chapter 59, whichever is later. Include the information listed in LAC 33:III.5911.B, and submit to the Department of Environmental Quality, Office of Environmental Compliance, Surveillance Division.
- 551 [LAC 33:III.905] Submit amended registration: Due to the Department of Environmental Quality, Office of Environmental Compliance, Surveillance Division within 60 days after the information in the submitted registration is no longer accurate.
- 552 [LAC 33:III.913] Install air pollution control facilities whenever practically, economically, and technologically feasible. When facilities have been installed on a property, use them and diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the facilities, even though the ambient air quality standards in affected areas are not exceeded.
- 553 [LAC 33:III.917.A] Provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of emission limits.
- 554 [LAC 33:III.917.B] Where, upon written application of the responsible person or persons, the administrative authority finds that by reason of exceptional circumstances strict conformity with any provisions of these regulations would cause undue hardship, would be unreasonable, impractical or not feasible under the circumstances, the administrative authority may permit a variance from these regulations.
- 555 [LAC 33:III.919.D] No variance may permit or authorize the maintenance of a nuisance, or a danger to public health or safety.
- 556 [LAC 33:III.927] Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year. Submit emission inventory data in the format specified by the Office of Environmental Assessment, Environmental Evaluation Division. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D.
- Report the unauthorized discharge of any air pollutant into the atmosphere in accordance with LAC 33:I.Chapter 39, Notification Regulations and Procedures for Unauthorized Discharges. Submit written reports to the department pursuant to LAC 33:I.3925. Submit timely and appropriate follow-up reports detailing methods and procedures to be used to prevent similar atmospheric releases.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

UNF 0001 - Cathyal Plant

557 [LAC 33:III.929.A]

No person or group of persons shall allow particulate matter or gases to become airborne in amounts which cause the ambient air quality standards to be exceeded.



A/AI/PE 110000450100

September 23, 2010

RECEIVED
AIR PLANNING SEC.
10 OCT - 1 PM 1:50

Ms. Cheryl Nolan, Assistant Secretary (**Hand Delivered**, 3 copies)
LA Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, LA 70821-4313

Chief, Air Permits Section (6PD-R)
U.S. Environmental Protection Agency, Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Subject: **Application for Permit Modification – Sulfuric Acid Plant**
Rhodia, Inc., Baton Rouge, LA
Title V Permit No. 0840-0033-V2
Agency Interest No. 1314

Dear Ms. Nolan:

On November 30, 2009, LDEQ issued a Title V Permit Renewal to Rhodia for the Sulfuric Acid Plant. Rhodia is requesting a permit modification to include a federally enforceable annual capacity factor limitation for the Rental (Holman) boiler. The application also addresses minor revisions to applicable requirements and emission reconciliation issues.

If you have any questions or require any further information, please call John Richardson at 359-3768 or Julie Sheffield at 359-3432.

Sincerely,

John Richardson
Environmental Manager

File 402.1.2



**APPLICATION
TO MODIFY
ACID PLANT
TITLE V AIR
PERMIT**

AI 1314

**SEPTEMBER
2010**

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SECTION 1.0
INTRODUCTION

1.0 INTRODUCTION

1.1 Background

Rhodia, Inc. operates a sulfuric acid plant in Baton Rouge, East Baton Rouge Parish. The plant currently operates under Title V Permit No. 0840-00033-V2. Operating rates and process descriptions are unchanged from the current permit, except for the boiler issues discussed below.

The plant has two natural-gas fired boilers for backup steam supply. In March 2010, the Package (ABCO) Boiler had a serious malfunction and has been undergoing offsite repair/rebuild. Although a detailed reconstruction cost analysis has not been performed, Rhodia assumes that this project is "reconstruction" per NSPS Db. Note that the ABCO boiler was already subject to NSPS Db.

The ABCO boiler will return onsite in September. Rhodia has scheduled J&M Boiler to tune the boiler after startup and Weston Solutions, Inc. to stack test for NOx and CO. Emissions data will be collected over the full operating range of the boiler to either confirm or update the existing parametric NOx Monitoring Plan per §60.48b(g)(2). However, Rhodia plans to install a NOx analyzer on the ABCO boiler per §60.48b(b)(1) to replace the existing parametric Monitoring Plan. Rhodia will continue to use the NOx Monitoring plan until the NOx analyzer is installed and certified in the first or second quarter of 2011.

Assuming that reconstruction of an NSPS Db boiler requires a new 30-day performance test per §60.46b(e)(1), Rhodia requests approval from LDEQ to delay the test until after the NOx analyzer is installed and certified. Note that §60.8(b)(4) allows LDEQ to waive the performance test requirement if LDEQ is satisfied that the source has demonstrated compliance with the standard by other means. Rhodia is proposing to delay the 30-day performance test, not waive it, and will also conduct the shorter-term NOx testing discussed above upon boiler re-startup to demonstrate compliance in the interim before the NOx analyzer is online.

Because the Rental (Holman) Boiler has been the sole backup steam supply since the ABCO malfunction, it has operated at >10% annual capacity factor for 2010 as discussed in a letter to LDEQ on March 23, 2010. Note that the maximum heat input capacity was demonstrated to be 124 MMBTU/hr in February 2010 which supersedes the December 2006 demonstration at 104 MMBTU/hr (manufacturer's rating is 133 MMBTU/hr).

1.2 Requested Modifications

- Reinststate the 10% annual capacity limit per 40 CFR 60.44b(j)(3) on the Rental (Holman) Boiler (EIQ 1-06, EQT 0186), effective January 1, 2011. The permit should no longer reference 104 MMBTU/hr as the maximum heat input capacity (see permit briefing sheet). Rhodia requests that the permit not specify the maximum heat input capacity numerically. Instead, the boiler should be "limited to 10% annual capacity factor as defined in §60.41b based upon maximum heat input capacity as defined in §60.46b(g)."
- Modify the applicable NSPS Subpart Db requirements for the Package (ABCO) Boiler (EIQ 6-90, EQT 0153) to address the NO_x analyzer. These requirements should become effective upon installation of the NO_x analyzer in the first half of 2011.
- Request that LDEQ grant an extension to the 30-day NO_x performance test required by 60.46b(e) until the NO_x analyzer is installed and certified.
- Revise the maximum lbs/hr limit for NO_x on the Package (ABCO) Boiler to allow for normal variation in short-term emissions.
- Reconcile emissions of PM₁₀ from the cooling towers using a better estimate of total dissolved solids (TDS). Please see the letter from Rhodia to LDEQ on October 13, 2009 for more information.
- Reconcile emissions from the gasoline tank (EIQ 28, EQT 0152) using updated input parameters in the TANKS 4.09 program.
- Create an EIQ form for the Diesel Fire Water Pump 20G961 (EIQ M10). This pump will be subject to 40 CFR Part 63 Subpart ZZZZ.
- Request clarifications to the GCXVII Activities table and List of Insignificant Activities.
- Replace the specific requirement for weekly pump inspections in the Treatments Services area with the appropriate requirement for dual-mechanical seal pumps.
- Submit a revised EIQ form for Treatment Services Sumps. The revised EIQ updates UTM coordinates only.

1.3 Future Permit Actions

Voluntary stack testing conducted in September 2009 on two vapor combustors (Treatment Services Vapor Combustor EIQ 21, EQT 0147; Acid Plant Vapor Combustor, EIQ 27, EQT 0151) indicated some emission rates in excess of permitted maximum hourly rates (see the November 30, 2009 letter from Rhodia to LDEQ). These vapor combustors are both backup control devices. Efforts are well underway to reduce emissions where possible (i.e., decreased utilization of backup devices, combustor tuning, TSVC internals and stack will be replaced in the fourth quarter of 2010). However, permit limits for some pollutants may ultimately need to be reconciled to better reflect actual operation. This will be addressed in a future permit action(s) because the troubleshooting, testing, and equipment modifications are not yet complete.

SECTION 2.0

APPLICATION FOR APPROVAL OF EMISSIONS

Department of Environmental Quality
Office of Environmental Services
Air Permits Division
P.O. Box 4313
Baton Rouge, LA 70821-4313
(225) 219-3181

LOUISIANA

Application for Approval of Emissions of Air Pollutants from Part 70 Sources



PLEASE TYPE OR PRINT

1. Facility Information [LAC 33:III.517.D.1]

Facility Name (if any) Sulfuric Acid Plant		<input type="radio"/> All Process Units <input checked="" type="radio"/> Process Unit-Specific Permit
Agency Interest Number (A.I. Number) 1314	Currently Effective Permit Number(s) 0840-00033-V2	
Company - Name of Owner Rhodia, Inc.		
Company - Name of Operator (if different from Owner) N/A		
Parent Company (if Company - Name of Owner given above is a division) N/A		

Ownership:

Check the appropriate box.

- | | | |
|---|--|--|
| <input checked="" type="radio"/> corporation, partnership, or sole proprietorship | <input type="radio"/> regulated utility | <input type="radio"/> municipal government |
| <input type="radio"/> state government | <input type="radio"/> federal government | <input type="radio"/> other, specify |

2. Physical Location and Process Description [LAC 33:III.517.D.18, unless otherwise stated]

What does this facility produce? Add more rows as necessary

Sulfuric Acid

What modifications/changes are proposed in this application? Add more rows as necessary.

Please see attached introduction

Nearest town (in the same parish as the facility):

Parish(es) where facility is located:

Distance To (mi):	~222	Texas	~269	Arkansas	~129	Mississippi	~262	Alabama
Latitude Front Gate:	30	Deg	30	Min	30	Sec	30	Hundredths
Longitude Front Gate:	-91	Deg	11	Min	16	Sec	58	Hundredths
Distance from nearest Class I Area	225	Kilometers						

Add physical address and description of location of the facility below. If the facility has no address, provide driving directions.
Add more rows as necessary.

1275 Airline Highway, Baton Rouge, LA 70805. Rhodia is located immediately north of Highway 190 along the east bank of the Mississippi River.

- ☒ Map attached (required per LAC 33:III.517.D.1)
- ☐ Description of processes and products attached (required per LAC 33:III.517.D.2) NOTE: no change from current permit
- ☒ Introduction/Description of the proposed project attached (required per LAC 33:III.517.D.5)

3. Confidentiality [LAC 33:I.Chapter 5]

Are you requesting confidentiality for any information except air pollutant emission rates ? ☐ Yes ☒ No

If "yes," list the sections for which confidentiality is requested below. Add rows as necessary. Confidentiality requests require a submittal that is separate from this application. Information for which confidentiality is requested should not be submitted with this application. Consult instructions.

4. Type of Application [LAC 33:III.517.D]

Complete the appropriate column (1 or 2) that corresponds to the type of permit being sought. Check all that apply within the appropriate column.

Column 1	Column 2
<input type="checkbox"/> Part 70 General	<input checked="" type="checkbox"/> Part 70 Regular
<input type="checkbox"/> Renewal	<input type="checkbox"/> Renewal
Select one, if applicable: <input type="checkbox"/> Entirely new facility <input type="checkbox"/> Modification or expansion of existing facility (may also include reconciliations) <input type="checkbox"/> Reconciliation only <input type="checkbox"/> Individual emissions unit(s) addition	Select one, if applicable: <input type="checkbox"/> Entirely new facility <input checked="" type="checkbox"/> Significant modification or expansion of existing facility (may also include reconciliations) [LAC 33:III.527] <input type="checkbox"/> Minor modification or expansion of existing facility (may also include reconciliations) [LAC 33:III.525] <input type="checkbox"/> Reconciliation only NSR Analysis: <input type="checkbox"/> PSD <input type="checkbox"/> NNSR
Does this submittal update or replace an application currently under review? <input type="radio"/> Yes <input checked="" type="radio"/> No	
If yes, provide date that the prior application was submitted:	N/A
Select one if this application is for an existing facility that does not have an air quality permit: <input type="checkbox"/> Previously Grandfathered (LAC 33:III.501.B.6) <input type="checkbox"/> Previously Exempted (e.g., Small Source Exemption; Act 918) <input type="checkbox"/> Previously Unpermitted	

5. Fee Information [LAC 33:III.517.D.17]

Fee Parameter: If the fee code is based on an operational parameter (such as number of employees or capital cost), enter that parameter here.	Per ton daily rate capacity
Industrial Category: Enter the Standard Industrial Classification (SIC) Codes that apply to the facility.	
Primary SICC: 2819	
Secondary SICC(s): N/A	

Project Fee Calculation: Enter fee code, permit type, production capacity/throughput, and fee amount pursuant to LAC 33:III.Chapter 2. Add rows to this table as needed. Include with the application the amount in the Grand Total blank as the permit application fee.

FEE CODE	TYPE	EXISTING CAPACITY	INCREMENTAL INCREASE	SURCHARGE				TOTAL AMOUNT
				MULTIPLIER	NSPS	PSD	TOXICS	
0540	minor				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ 1,556.00
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
GRAND TOTAL								\$ 1,556.00

****Optional** Fee Explanation:** Use the space provided to give an explanation of the fee determination displayed above.

Minimum minor mod fee applies per LAC 33:III.211.B.13.d. Emissions are being reconciled only. The modification is only "significant" from the standpoint of new applicable requirements.

Electronic Fund Transfer (EFT): If paying the permit application fee using an Electronic Fund Transfer (EFT), please include the EFT Transaction Number, the Date that the EFT was made, and the total dollar amount submitted in the EFT. If not paying the permit application fee using EFT, leave blank.

EFT Transaction Number	Date of Submittal	Total Dollar Amount

6. Key Dates

Estimated date construction will commence:	NA
Estimated date operation will commence:	NA

7. Pending Permit Applications – For Process Unit-Specific Permits Only [LAC 33:III.517.D.18]

List all other process units at this facility for which Part 70 permit applications have been submitted, but have not been acted upon by LDEQ as of the date of submittal of this application. If none, state "none" in the table. **It is not necessary to update this table during the permit review process, unless requested by LDEQ.**

Process Unit Name	Permit Number	Date Submitted
CATHYVAL	2184-V1	February 15, 2010

8. LAC 33:I.1701 Requirements – Answer all below for new sources and permit renewals

Does the company or owner have federal or state environmental permits identical to, or of a similar nature to, the permit for which you are applying in Louisiana or other states? (This requirement applies to all individuals, partnerships, corporations, or other entities who own a controlling interest of 50% or more in your company, or who participate in the environmental management of the facility for an entity applying for the permit or an ownership interest in the permit.)	<input checked="" type="radio"/> Yes <input type="radio"/> No
If yes, list States:	Indiana, California, Texas
Do you owe any outstanding fees or final penalties to the Department? If yes, explain below. Add rows if necessary.	<input type="radio"/> Yes <input checked="" type="radio"/> No
Is your company a corporation or limited liability company? If yes, attach a copy of your company's Certificate of Registration and/or Certificate of Good Standing from the Secretary of State. The appropriate certificate(s) should be attached to the end of this application as an appendix.	<input checked="" type="radio"/> Yes <input type="radio"/> No

9. Permit Shield Request [LAC 33:III.517.E.7]

If yes, check the appropriate boxes to indicate the type of permit shield being sought. Include the specific regulatory citation(s) for which the shield is being requested. Give an explanation of the circumstances that will justify the permit shield request. Attach additional pages if necessary. If additional pages are used, attach them directly behind this page and enter "See Attached Pages" into the Explanation field.	<input type="radio"/> Yes <input checked="" type="radio"/> No Note: no new permit shields being requested.
---	---

Type of Permit Shield request (check all that apply):

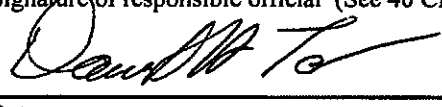
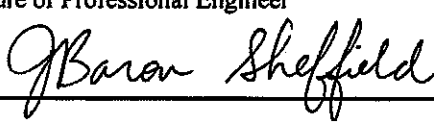
Non-applicability determination	Specific Citation(s)	Explanation
<input type="checkbox"/> 40 CFR 60		
<input type="checkbox"/> 41 CFR 61		
<input type="checkbox"/> 42 CFR 63		
<input type="checkbox"/> PSD		
<input type="checkbox"/> NNSR		
Interpretation of monitoring/recordkeeping/ reporting and/or means of compliance		
<input type="checkbox"/> 40 CFR 60		
<input type="checkbox"/> 41 CFR 61		
<input type="checkbox"/> 42 CFR 63		
<input type="checkbox"/> PSD		
<input type="checkbox"/> NNSR		
<input type="checkbox"/> State Implementation Plan (SIP)		

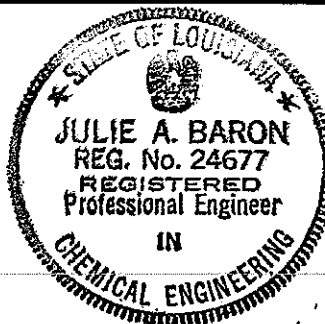
10. Certification of Compliance with Applicable Requirements

Statement for Applicable Requirements for Which the Company and Facility Referenced In This Application Is In Compliance

Based on information and belief, formed after reasonable inquiry, the company and facility referenced in this application is in compliance with and will continue to comply with all applicable requirements pertaining to the sources covered by the permit application, as outlined in Tables 1 and 2 in the permit application.

For requirements promulgated as of the date of this certification with compliance dates effective during the permit term, I further certify that the company and facility referenced in this application will comply with such requirements on a timely basis and will continue to comply with such requirements.

CERTIFICATION: I certify, under provisions in Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information contained in this Application for Approval of Emissions of Air Pollutants from Part 70 Sources, including all attachments thereto and the compliance statement above, are true, accurate, and complete.			CERTIFICATION: I certify that the engineering calculations, drawings, and design are true and accurate to the best of my knowledge.		
a. Responsible Official			b. Professional Engineer		
Name Daniel Tate			Name Julie Baron Sheffield		
Title Plant Manager			Title Environmental Consultant		
Company Rhodia, Inc.			Company JBS, L.L.C.		
Suite, mail drop, or division			Suite, mail drop, or division		
Street or P.O. Box PO Box 828			Street or P.O. Box PO Box 828		
City Baton Rouge	State LA	Zip 70821	City Baton Rouge	State LA	Zip 70821
Business phone (225) 359-3751			Business phone (225) 359-3432		
Email Address Daniel.Tate@US.RHODIA.com			Email Address Julie.Sheffield@US.RHODIA.com		
Signature of responsible official (See 40 CFR 70.2) 			Signature of Professional Engineer 		
Date 8/16/2010			Date 9-15-10		
Louisiana Registration No.			24677		



11. Personnel [LAC 33:III.517.D.1]**a. Manager of Facility who is located at plant site**

Name <input type="radio"/> Primary Contact		
Daniel Tate		
Title		
Plant Manager		
Company		
Rhodia, Inc.		
Suite, mail drop, or division		
Street or P.O. Box		
PO Box 828		
City	State	Zip
Baton Rouge	LA	70821
Business phone		
(225) 359-3751		
Email Address		
<u>Daniel.Tate@US.RHODIA.com</u>		

b. On-site contact regarding air pollution control

Name <input type="radio"/> Primary Contact		
John Richardson		
Title		
Environmental Manager		
Company		
Rhodia, Inc.		
Suite, mail drop, or division		
Street or P.O. Box		
PO Box 828		
City	State	Zip
Baton Rouge	LA	70821
Business phone		
(225) 359-3768		
Email Address		
<u>John.Richardson@US.RHODIA.com</u>		

c. Person to contact with written correspondence

Name <input checked="" type="radio"/> Primary Contact		
John Richardson		
Title		
Environmental Manager		
Company		
Rhodia, Inc.		
Suite, mail drop, or division		
Street or P.O. Box		
PO Box 828		
City	State	Zip
Baton Rouge	LA	70821
Business phone		
(225) 359-3768		
Email Address		
<u>John.Richardson@US.RHODIA.com</u>		

d. Person who prepared this report

Name <input type="radio"/> Primary Contact		
Title		
Company		
Suite, mail drop, or division		
Street or P.O. Box		
City	State	Zip
Business phone		
Email Address		

e. Person to contact about Annual Maintenance Fees

See "b"

Name		Street or P.O. Box	
Title	City	State	Zip
Company	Business phone		
Suite, mail drop, or division	Email Address		

12. Proposed Project Emissions [LAC 33:III.517.D.3]

List the total emissions following the proposed project for this facility or process unit (for process unit-specific permits). Speciate all criteria pollutants, TAP, and HAP for the proposed project.

Pollutant	Proposed Emission Rate (tons/yr)
<i>Listed below are the only pollutants being modified, and these are the proposed process-unit specific totals after the proposed permit modification. All other pollutants (TAPs) will remain at currently permitted rates and, for brevity, are not listed below.</i>	
PM ₁₀	135.46
SO ₂	phase I: 12449.45
SO ₂	phase II: 4726.08
SO ₂	phase III: 1077.89
NO _x	117.13
CO	95.76
VOC Total	26.53

13. History of Permitted Emissions [LAC 33:III.517.D.18]

List each of the following in chronological order:

- The Permit Number and Date Action Issued for each air quality permit that has been issued to this facility or process unit (for process unit-specific permits) within the last ten (10) years.
- All small source exemptions, authorizations to construct, administrative amendments, case-by-case insignificant activities, and changes of tank service that have been approved since the currently effective Title V Operating Permit or State Operating Permit was issued to this facility or process unit (for process unit-specific permits). It is not necessary to list any such activities issued prior to the issuance of the currently effective Title V Operating Permit or State Operating Permit, if one exists.

Permit Number	Date Action Issued
0840-00033-V2	November 30, 2009

14. Facility-wide Permitted Emissions – For Process Unit-Specific Permits Only [LAC 33:III.517.D.3]

List each of the following:

- All currently effective air quality permits for this facility. All process units located at this facility should be represented in this section. This includes any Acid Rain or PSD permits.

For each listed currently effective air quality permit:

- Show each permitting action's grand total for each permitted pollutant. These rates should be those shown in the permitting action as issued by LDEQ and not those shown in the application for the permitting action. For administrative amendments, it is only necessary to state the emission rates that were amended.
- Group the permitted emission rates by permit action. Consult instructions.

As the last entry, show the facility-wide grand total for each pollutant.

Permit Actions	Date Action Issued	Pollutant	Permitted Emission Rate (tons/yr)
<i>Listed below are the only pollutants being modified, and these are the currently-permitted process-unit specific totals for these pollutants. All other pollutants (TAPs) will remain at currently permitted rates and, for brevity, are not listed below.</i>			
2184-V1	September 4, 2007	PM ₁₀	7.74
		SO ₂	0.03
		NO _x	4.41
		CO	3.70
		VOC total	25.02
0840-00033-V2	November 30, 2009	PM ₁₀	54.52
		SO ₂ - Phase III	1077.79

		NO _x	115.58
		CO	95.43
		VOC total	26.16
Facility Total		PM ₁₀	62.26
		SO ₂ - Phase III	1077.82
		NO _x	119.99
		CO	99.13
		VOC total	51.18

15.a. Enforcement Actions [LAC 33:III.517.D.18]

<p><i>If yes, list all federal and state air quality enforcement actions, settlement agreements, and consent decrees received for this facility and/or process unit (for process unit-specific permits) since the issuance of the currently effective Title V Operating Permit or State Operating Permit. For each action, list the type of action (or its tracking number), the regulatory authority or authorities that issued the action, and the date that the action was issued. Summarize the conditions imposed by the enforcement action, settlement agreement, and consent decree in Section 23, Table 2. It is not necessary to submit a copy of the referenced action. Add rows to table as necessary.</i></p>			<input type="radio"/> Yes <input checked="" type="radio"/> No No such actions since issuance of current permit.
Type of Action or Tracking Number	Issuing Authority	Date Action Issued	Summary of Conditions Included?
			<input type="radio"/> Yes <input checked="" type="radio"/> No

15.b. Schedule for Compliance [LAC 33:III.517.E.4]

<i>If the facility or process unit for which application is being made is not in full compliance with all applicable regulations, give a description of how compliance will be achieved, including a schedule for compliance below. Add rows as necessary. See instructions.</i>	<input type="radio"/> Yes <input checked="" type="radio"/> No

16. Letters of Approval for Alternate Methods of Compliance

<i>If yes, list all correspondence with LDEQ, EPA, or other regulatory bodies that provides for or supports a request for alternate methods of compliance with any applicable regulations for this facility or process unit (for process unit-specific permits). List the date of issuance of the letter and the regulation referenced by the letter. Attach as an appendix a copy of all documents referenced in this table. Letters that are not included may not be incorporated into a final permit. Add rows to table as necessary.</i>			<input type="radio"/> Yes <input checked="" type="radio"/> No No such documents since issuance of current permit.
Date Letter Issued	Issuing Authority	Referenced Regulation(s)	Copy of Letter Attached?
			<input type="radio"/> Yes <input checked="" type="radio"/> No
			<input type="radio"/> Yes <input checked="" type="radio"/> No

17. Initial Notifications and Performance Tests [LAC 33:III.517.E.1]

<i>If yes, list any initial notifications that have been submitted or one-time performance tests that have been performed for this facility or process unit (for process unit-specific permits) since the issuance of the currently effective Title V Operating Permit or State Operating Permit in order to satisfy regulatory requirements. Any initial notification or one-time performance test requirements that have not been satisfied should be listed in Section 23, Table 2 of this application. Any notifications or performance tests that recur periodically should also be properly noted in Section 23, Table 2 of this application. Add rows to table as necessary.</i>			<input checked="" type="radio"/> Yes <input type="radio"/> No
Initial Notification or One-time Performance Test?	Regulatory Citation Satisfied	Date Completed/Approved	
Initial 30-Day NOx Performance Test for Rental (Holman) Boiler to temporarily operate at >10% annual capacity factor, EIQ 1-06, EQT0186	40 CFR 60.8 and 60.46b(e)	Submitted test report 7/29/10	
Update of Maximum Heat Input Capacity Test for Rental (Holman) Boiler, EIQ 1-06, EQT0186	40 CFR 60.8 and 60.46b(g)	Submitted test report 9/3/10	

18. Existing Prevention of Significant Deterioration or Nonattainment New Source Review Limitations [LAC 33:III.517.D.18]

<i>Do one or more emissions sources represented in this permit application currently operate under one or more NSR permits? If "yes," summarize the limitations from such permit(s) in the following table. Add rows to table as necessary. Be sure to note any annual emissions limitations from such permit(s) in Sections 13 and 14 of this application.</i>							<input type="radio"/> Yes <input checked="" type="radio"/> No
Permit No.	Date Issued	EPN	Pollutant	BACT/LAER Limit ¹	Averaging Period	Description of Control Technology/Work Practice Standards	

¹For example, lb/MM Btu, ppmvd @ 15% O₂, lb/ton, lb/hr

19. Air Quality Dispersion Modeling [LAC 33:III.517.D.15]

Was Air Quality Dispersion Modeling as required by LAC 33:III performed in support of this permit application? (Air Quality Dispersion Modeling is only required when applying for PSD permits and as requested by LDEQ.)	<input type="radio"/> Yes <input checked="" type="radio"/> No
Has Air Quality Dispersion Modeling completed in accordance with LAC 33:III ever been performed for this facility in support of a air permit application previously submitted for this facility or process unit (for process unit-specific permits) or as required by other regulations AND approved by LDEQ?	<input checked="" type="radio"/> Yes <input type="radio"/> No
If yes, enter the date the most recent Air Quality Dispersion Modeling results as required by LAC 33:III were submitted:	October 6, 2008

If the answer to either question above is "yes," enter a summary of the most recent results in the following table. If the answer to both questions is "no," enter "none" in the table. Add rows to table as necessary.

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	TAP AAS or NAAQS
H ₂ SO ₄	8-hour	17.55 µg/m ³ (2002)	23.8 µg/m ³
H ₂ SO ₄	8-hour	18.19 µg/m ³ (2003)	23.8 µg/m ³
H ₂ SO ₄	8-hour	22.32 µg/m ³ (2004)	23.8 µg/m ³
H ₂ SO ₄	8-hour	18.06 µg/m ³ (2005)	23.8 µg/m ³
H ₂ SO ₄	8-hour	18.60 µg/m ³ (2006)	23.8 µg/m ³

20. General Condition XVII Activities

Enter all activities that qualify as Louisiana Air Emissions Permit General Condition XVII Activities. <ul style="list-style-type: none"> Expand this table as necessary to include all such activities. See instructions to determine what qualifies as a General Condition XVII Activity. Do not include emissions from General Condition XVII Activities in the proposed emissions totals for the permit application. 							<input checked="" type="radio"/> Yes <input type="radio"/> No	
ID No.	Work Activity	Schedule	Emission Rates – TPY					
			PM ₁₀	SO ₂	NO _x	CO	VOC	Other
Note: Edits from current GCXVII List shaded gray.								
GC 1	Catalyst reconditioned in Sulfuric Acid Unit Nos. 1 & 2	Once each 24 months per unit	0.2					
GC 2	Drum re-packaging	4 times per year					0.002	
GC 3	Vacuum trucks used for tank cleanouts, spill cleanup, and sump clean out	Weekly					0.06	
GC 4	Tank and process equipment cleaning						0.90	
GC 5	Opening of trucks and railcars containing waste fuel and spent acid for sampling, inspection, maintenance, or further processing	Daily					0.02	
GC 6	Sampling waste fuel trucks, railcars, and tanks via sample tap	10 times per day					0.01	##
GC 7	Sampling spent acid and IFS trucks, railcars, and barges	8 times per day					0.004	

GC 8	Washing inside surface of Unit 1 & 2 exhaust stacks	4 each Unit/Yr			1.33			0.03*
GC 9	Odor-neutralizing compounds						0.06	
GC 10	Manual gauging of tank levels						0.002	
GC 11	Melting sulfur solidified in piping and other equipment at the old sulfur pit (former EIQ ID 18)			<0.001				<0.001#
GC 12	Sampling for moisture content, stack gauging, and pressure readings from gas streams			<0.1				<0.1*
GC 13	Loading fresh acid onto heel of spent acid			0.003			0.004	
GC 14	Acid Plant Vapor Combustor (APVC) routine maintenance	96 hours per year (max)					3.25	**
GC 15	Unloading containers of spent acid with small percentage of chlorinated VOCs	1 per week		0.50			0.06	**

* Sulfuric Acid Mist

Hydrogen Sulfide

** Speciated VOCs covered by Spent Acid Process permitted emissions

Speciated VOCs covered by TS Process permitted emissions

21. Insignificant Activities [LAC 33:III.501.B.5]

Enter all activities that qualify as Insignificant Activities.

- Expand this table as necessary to include all such activities.
- For sources claimed to be insignificant based on size or emission rate (LAC 33:III.501.B.5.A), information must be supplied to verify each claim. This may include but is not limited to operating hours, volumes, and heat input ratings.
- If aggregate emissions from all similar pieces of equipment (i.e. all LAC 33:III.501.B.5.A.1 activities) claimed to be insignificant are greater than 5 tons per year for any pollutant, then the activities can not be claimed as insignificant and must be represented as permitted emission sources. Consult instructions.

☐ Yes ☐ No

EPN	Description	Physical/Operating Data	Citation
Note: Caustic Tanks containing no VOCs have been deleted per LAC 33:III.501.B Item B.40. Other edits from current IA list are shaded gray.			
20D962	Diesel Storage Tank, Firewater Pump	300 gals	LAC 33: III.501.B5.A.3
90D360	Diesel Storage Tank, Maintenance	1000 gals	LAC 33: III.501.B5.A.3
None	Diesel Storage Tank, IFS	1000 gals	LAC 33: III.501.B5.A.3
91D321	IFS Wash-water Storage Tank	9000 gals	LAC 33: III.501.B5.A.3
90D210	Laboratory Excess Sample Tank	100 gals	LAC 33: III.501.B5.A.2
Hoods	Different Analyses*	N/A	LAC 33: III.501.B5.A.6
	Drum Washing Operations	55 gals	LAC 33: III.501.B5.A.7

* Vents associated with exhaust hoods for laboratory equipment used exclusively for routine chemical and physical analysis with the purpose of quality control or environmental monitoring purposes.

22. Regulatory Applicability for Commonly Applicable Regulations [LAC 33:III.517.D.10]

Does this facility contain asbestos or asbestos containing materials?

If "yes," the facility or any portion thereof may be subject to 40 CFR 61, Subpart M, LAC 33:III.Chapter 27, and/or LAC 33:III.5151 and this application must address compliance as stated in Section 23 of this application.

☐ Yes ☐ No

Is the facility or process unit represented in this permit subject to 40 CFR 68, or is any other process unit located at the same facility as the process unit represented in this application subject to 40 CFR 68?

If "yes," the entire facility is subject to 40 CFR 68 and LAC 33:III.Chapter 59 and this application must address compliance as stated in Section 23 of this application.

☐ Yes ☐ No

Is the facility listed in LAC 33:III.5611

Table 5

☐ Yes ☐ No

Table 6

☐ Yes ☐ No

Table 7

☐ Yes ☐ No

Does the applicant own or operate commercial refrigeration equipment normally containing more than 50 pounds of refrigerant at this facility or process unit?

If "yes," the entire facility is subject to 40 CFR 82, Subpart F and this application must address compliance as stated in Section 23 of this application.

☐ Yes ☐ No

23. Applicable Regulations, Air Pollution Control Measures, Monitoring, and Recordkeeping

Important points for Table 1 [LAC 33:III.517.D.10]:

- List in Table 1, by Emission Point ID Number and Descriptive Name of the Equipment, state and federal pollution abatement programs and note the applicability or non-applicability of the regulations to each source.
- Adjust the headings for the columns in Table 1 as necessary to reflect all applicable regulations, in addition to any regulations that do not apply but need an applicability determination to verify this fact.
- For each piece of equipment, enter "1" for each regulation that applies. Enter "2" for each regulation that applies to this type of source, but from which this source of emissions is exempt. Enter "3" for equipment that is subject to a regulation, but does not have any applicable requirements. Also, enter "3" for each regulation that have applicable requirements that apply to the particular
- Leave the spaces blank when the regulations clearly would not apply under any circumstances to the source. For example, LAC
- Consult instructions.

Important points for Table 2 [LAC 33:III.517.D.4; LAC 33:III.517.D.7; LAC 33:III.517.D.10]:

- For each piece of equipment listed in Table 2, include all applicable limitation, recordkeeping, reporting, monitoring, and testing requirements. Also include any one-time notification or one-time tests performance test requirements that have not been
- Each of these regulatory aspects (limitation, recordkeeping, reporting, etc.) should be addressed for each regulation that is applicable to each emissions source or emissions point.
- For each regulation that provides a choice regarding the method of compliance, indicate the method of compliance that will be
- Consult instructions.

Important points for Table 3 [LAC 33:III.517.D.16]:

- Each time a 2 or a 3 is used to describe applicability of a source in Table 1, an entry should be made in Table 3 that explains the
- Fill in all requested information in the table.
- The exact regulatory citation that provides for the specific exemption or non-applicability determination should be entered into
- Consult Instructions.

Important points for Table 4 [LAC 33:III.517.D.18]

- List any single emission source that routes its emissions to another point where these emissions are commingled with the emissions of other sources before being released to the atmosphere. Do not list any single emission source in this table that does not
- List any and all emission sources that are routed as described above. This includes emission sources that do not otherwise
- Consult instructions.

24. Emissions Inventory Questionnaire (EIQ) Forms [LAC 33:III.517.D.3; 517.D.6]

Complete one (1) EIQ for:

- Each emission source. If two emission sources have a common stack, the applicant may submit one EIQ sheet for the common
- Each emissions CAP that is proposed. In general, this applies to each source that is part of the CAP.
- Each alternate operating scenario that a source may operate under. Some common scenarios are:
 1. Sources that combust multiple fuels
 2. Sources that have Startup/Shutdown max lb/hr emission rates higher than the max lb/hr for normal operating conditions would need an EIQ for the Startup/Shutdown emission rates for those sources
- Fugitive emissions releases. One (1) EIQ should be completed for each of the following types of fugitive emissions sources or
 1. Equipment leaks.
 2. Non-equipment leaks (i.e. road dust, settling ponds, etc).

For each EIQ:

- Fill in all requested information.
- Speciate all Toxic Air Pollutants and Hazardous Air Pollutants emitted by the source.
- Use appropriate significant figures.
- Consult instructions.

The EIQ is in Microsoft Word Excel. Click on this link to get to the EIQ form.

http://www.deq.louisiana.gov/portal/LinkClick.aspx?link=permits%2fair%2f6-6-07_EIQ.xls&tabid=2758

25. NSR Applicability Summary [LAC 33:III.504 and LAC 33:III.509]

■ N/A

This section consists of five tables, A-E, and is applicable only to new and existing major stationary sources (as defined in LAC

25.A. Project Summary

EPN	Description	A	B	C	D	E	F
		New, Modified, Affected, or Unaffected*	Pre-Project Allowables (TPY)	Baseline Actual Emissions (TPY)	Projected Actuals (TPY)	Post-Project PTE (TPY)	Change (TPY)
PM ₁₀	24-Month Period:						
PM ₁₀ Change:							0

*Unaffected emissions units are not required to be listed individually. By choosing not to list unaffected emissions units, the applicant asserts that all emissions units not listed in Table 24.A will not be modified or experience an increase in actual annual emissions as part of the proposed project.

25.B. Creditable Contemporaneous Changes

Contemporaneous Period:	
-------------------------	--

EPN	Description	A	B	C	D	E	F
		Date of Modification	Pre-Project (TPY)	Baseline Actual (TPY)	24-Month (TPY)	Post-Project (TPY)	Change (TPY)
PM ₁₀							
PM ₁₀ Change:							0

25.C. BACT/LAER Summary

For each source identified as "New" or "Modified" in Section 24.A, complete the following table for each pollutant that will trigger

EPN	Pollutant	BACT/LAER	Limitation	Averaging Period	Description of Control Technology/Work Practice Standard(s)

25.D. PSD Air Quality Analyses Summary

		A	B	C	D	E	F	G	H	I	J	K
Pollu	Averaging Period	Preliminary Screening Concentration ($\mu\text{g}/\text{m}^3$)	Level of Significant Impact ($\mu\text{g}/\text{m}^3$)	Significant Monitoring Concentration ($\mu\text{g}/\text{m}^3$)	At the Monitoring Station		Background ($\mu\text{g}/\text{m}^3$)	Maximum Modeled Concentration	Modeled + Background Concentration ($\mu\text{g}/\text{m}^3$)	NAAQS ($\mu\text{g}/\text{m}^3$)	Modeled PSD Increment Consumption ($\mu\text{g}/\text{m}^3$)	Allowable Class II PSD Increment ($\mu\text{g}/\text{m}^3$)
					Monitored Values ($\mu\text{g}/\text{m}^3$)	Modeling Results						
PM ₁₀	24-hour		5	10						150		30
	Annual		1	-						50		17
SO ₂	3-hour		25	-						1300		512
	24-hour		5	13						365		91
	Annual		1	-						80		20
NO _x	Annual		1	14						100		25
CO	1-hour		2000	-						40000		-
	8-hour		500	575						10000		-
Pb	3-month		-	0.1						1.5		-

25.E Nonattainment New Source Review Offsets [LAC 33:III.517.D.16, LAC 33:III.504.D.4 & 5]

Complete this section only if the proposed project triggers Nonattainment New Source Review (NNSR).

☒ N/A

This project triggers NNSR review for:

☐ NOx☐ VOC**NOx:**

<i>Is the applicant proposing to use internal offsets?</i>		<input type="radio"/> Yes <input checked="" type="radio"/> No
If not, identify the source of the offsets.	Company:	
	Facility/Unit:	
	Permit No.:	
<i>Is an ERC Bank Application included with this application, or has an application already been submitted to LDEQ?</i>		<input type="radio"/> Yes <input checked="" type="radio"/> No
If the ERC application has already been submitted, give the date:		
Identify the emissions units from which the offsets will be obtained (reference specific Emission Point ID numbers).		

VOC:

<i>Is the applicant proposing to use internal offsets?</i>		<input type="radio"/> Yes <input checked="" type="radio"/> No
If not, identify the source of the offsets.	Company:	
	Facility/Unit:	
	Permit No.:	
<i>Is an ERC Bank Application included with this application, or has an application already been submitted to LDEQ?</i>		<input type="radio"/> Yes <input checked="" type="radio"/> No
If the ERC application has already been submitted, give the date:		
Identify the emissions units from which the offsets will be obtained (reference specific Emission Point ID numbers).		

In order to expedite processing, please be sure the ERC Bank Application is completed properly. In the case of NOX, the document

25.F. Economic Impact

Answer the following questions.

How many temporary jobs will be added as a result of this project?	
How many permanent jobs will be added as a result of this project?	

25.G Notification of Federal Land Manager [LAC 33:III.504.E.1, LAC 33:III.509.P.1]

Complete this section only if the proposed project triggers NNSR or PSD.

a. Is the proposed facility or modification located within 100 kilometers of a Class I Area? ☐ Yes ☐ No

If Yes, determination of Q/d is not required; skip to the next question. If No, complete the Q/d equation below:

$$Q/d = \frac{PM_{10(NEI)} + SO_{2(NEI)} + NO_{X(NEI)} + H_2SO_{4(NEI)}}{\text{Class I km}}$$

$PM_{10(NEI)}$	=	net emissions increase of PM_{10} ^{1,2}
$SO_{2(NEI)}$	=	net emissions increase of SO_2 ^{1,2}
$NO_{X(NEI)}$	=	net emissions increase of NO_X ^{1,2}
$H_2SO_{4(NEI)}$	=	net emissions increase of H_2SO_4 ^{1,2}
Class I km	=	distance to nearest Class I Area ³

Q/d = _____ =

If Q/D < 4, proceed to Section 26. If Q/D ≥ 4, complete the remainder of this Section.

b. Has the applicant provided a copy of the application to the Federal Land Manager? ☐ Yes ☐ No

c. Does the application contain modeling that demonstrates no adverse impact on Air Quality Related Values (AQRVs) in the Class I Area? ☐ Yes ☐ No

d. If Yes, indicate the model used: ☐ VISCREEN ☐ PLUVUE II ☐ CALPUFF ☐ Other⁴:

e. Has the Federal Land Manager concurred that the proposed project will not adversely impact any AQRVs? If Yes, please attach correspondence. ☐ Yes ☐ No

¹If the net emissions increase of any pollutant is negative, enter "0."

²If the project did not trigger a netting analysis, use the project increase. In this case, the value will be less than the pollutant's

³In kilometers.

⁴Model must be approved by LDEQ and the Federal Land Manager.

26. Environmental Assessment Statement (EAS or "IT" Question Responses) [La. R.S. 30:2018]

<i>This section is required when applying for new Part 70 operating permits and/or major modifications. Any applications for these permit types that do not include answers to these questions will not be considered to be administratively complete.</i>			<input type="radio"/> Yes <input checked="" type="radio"/> No		
For new Part 70 operating permits and/or major modifications, answers to these questions must be provided by the applicant to the					
Name of Local Governing Authority			Name of Designated Public Library		
Office of the Mayor-President					
Street or P.O. Box			Street or P.O. Box		
222 St. Louis St., 3rd Floor			7373 Scenic Hwy		
City	State	Zip Code	City	State	Zip Code
Baton Rouge	LA	70802	Baton Rouge	LA	70807

Answer the following five questions on separate pages using full and complete answers. Include as many pages as necessary in order to provide full and complete answers. This information is required per Louisiana Revised Statutes 30:2018 (La. R.S. 30:2018).

PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

Instructions: Complete this checklist and submit with the completed air permit application.

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit Application	Yes	No	N/A	Location Within the Permit Application
517.A Timely Submittal	Was a Copy of the Application Also Submitted to EPA?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	
517.B.1,2 Certification	Does the Application include a Certification by a Responsible Official?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 10
517.B.3 Certification	Does the Application Include Certification by a Professional Engineer or their Designee:	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 10
517.D.1 Identifying Information	Does the Application Include:				
	1. Company Name, Physical and Mailing Address of Facility?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 2
	2. Map showing Location of the Facility?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Appendix A
	3. Owner and Operator Names and Agent?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 1
	4. Name and Telephone Number of Plant Manager or Contact?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 11
517.D.2 SIC Codes, Source Categories	Does the Application Include a Description of the Source's Processes and Products?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	No change from current permit
	Does the Application Include the Source's SIC Code?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 5
	Does the Application Include EPA Source Category of HAPs if applicable?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.D.3,6 EIQ Sheets	Has an EIQ Sheet been Completed for each Emission Point whether an Area or Point Source?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 24
517.D.4 Monitoring Devices	Does the Application Include Identification and Description of Compliance Monitoring Devices or Activities?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 24
517.D.5 Revisions and Modifications Only	For Revisions or Modifications, Does the Application include a Description of the Proposed Change and any Resulting Change in Emissions?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Text - Section 1, AAE - Section 2, 24, and 25
517.D.7 General Information	Does the Application Include Information Regarding Fuels, Fuel Use, Raw Materials, Production Rates, and Operating Schedules as necessary to substantiate emission rates?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 24
517 D.8 Operating Limitations	Has Information Regarding any Limitations on Source Operation or any Applicable Work Practice Standards been Identified?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 23, 24
517.D.9 Calculations	Are Emission Calculations Provided?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Appendix B
517.D.10 Regulatory Review	Does the Application Include a Citation and Description of Applicable Louisiana and Federal Air Quality Requirements and Standards?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 23
517.D.11 Test Methods	Has a Description of or a Reference to Applicable Test Methods Used to Determine Compliance with Standards been Provided?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.D.12 Major Sources of TAPs	Does the Application include Information Regarding the Compliance History of Sources Owned or Operated by the Applicant (per LAC 33:III.5111)?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.D.13 Major Sources of TAPs	Does the Application include a Demonstration to show that the Source Meets all Applicable MACT and Ambient Air Standard Requirements?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	No change

PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

Instructions: Complete this checklist and submit with the completed air permit application.

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit Application	Yes	No	N/A	Location Within the Permit Application
517.D.14 PSD Sources Only	If Required by DEQ, Does the Application Include Information Regarding the Ambient Air Impact for Criteria Pollutants as Required for the Source Impact Analysis per LAC 33:III.509.K, L, and M?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517 D.15 PSD Sources Only	If Required by DEQ, Does the Application Include a Detailed Ambient Air Analysis?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.D.16, 18	Has any Additional Information been Provided?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Text
517.D.17 Fees	Has the Fee Code been Identified?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Text - Section 5
	Is the Applicable Fee Included with the Application?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	
517.E.1 Additional Part 70 Requirements	Does the Certification Statement Include a Description of the Compliance Status of Each Emission Point in the Source with All Applicable Requirements?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 10
517.E.2 Additional Part 70 Requirements	Does the Certification Statement Include a Statement that the Source will continue to Comply with All Applicable Requirements with which the Source is in Compliance?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 10
517.E.3 Additional Part 70 Requirements	Does the Certification Statement Include a Statement that the Source will, on a timely basis, meet All Applicable Requirements that will Become Effective During the Permit Term?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 10
517.E.4 Additional Part 70 Requirements	Are there Applicable Requirements for which the Source is not in Compliance at the Time of Submittal?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
	Does the Application include a Compliance Plan Schedule?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
	Does the Schedule Include Milestone Dates for which Significant Actions will occur?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
	Does the Schedule Include Submittal Dates for Certified Progress Reports?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.E.5 Additional Part 70 Requirements Acid Rain	Is this Source Covered by the Federal Acid Rain Program?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
	Are the Requirements of LAC 33:III.517.E 1-4 included in the Acid Rain Portion of the Compliance Plan?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.E.6 Additional Part 70 Requirements	Have any Exemptions from any Applicable Requirements been Requested?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 23
	Is the List and explanations Provided?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 23
517.E.7 Additional Part 70 Requirements	Does the Application Include a Request for a Permit Shield?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	No new shield requested
	Does the Request List those Federally Applicable Requirements for which the Shield is Requested along with the Corresponding	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.E.8 Additional Part 70 Requirements	Does the Application Identify any Reasonably Anticipated Alternative Operating Scenarios?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
	Does the Application include Sufficient Information to Develop permit Terms and Conditions for Each Scenario, Including	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.F Confidentiality	Does the Application Include a Request for Non-Disclosure (Confidentiality)?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	

PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

Instructions: Complete this checklist and submit with the completed air permit application.

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit Application	Yes	No	N/A	Location Within the Permit Application
525.B. Minor Permit Modifications	Does the Application Include a Listing of New Requirements Resulting for the Change?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	not a minor mod
	Does the Application Include Certification by the Responsible Official that the Proposed Action Fits the Definition of a Minor Modification as per LAC 33:III.525.A.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	not a minor mod
	Does the Certification also Request that Minor Modification Procedures be Used?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	not a minor mod
	Does the Application, for Part 70 Sources, Include the Owner's Suggested Draft Permit and Completed Forms for the Permitting Authority to Use to Notify Affected States?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	not a minor mod
La. R.S. 30:2018 – PSD/NNSR only	Has a copy of the answers to the questions posed in the Environmental Assessment Statement (Section 26) been sent to the local governing authority at no cost to the local governing authority?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	not PSD/NNSR
	Has a copy of the answers to the questions posed in the Environmental Assessment Statement (Section 26) been sent to the designated public library at no cost to the designated public library?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	not PSD/NNSR

SECTION 3.0

APPLICABLE REGULATIONS, AIR POLLUTION CONTROL MEASURES, MONITORING, AND RECORDKEEPING

TABLE 1: APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS

Source ID	Source Description	LAC 33:III.Chapter																
		5	9	11	13	15	2103	2104	2111	2113	2116	2123	22	29	51	53	56	59
There are no changes to applicable regulations with this permit modification application.																		

Source ID	Source Description	40 CFR 60					40 CFR 61			40 CFR 63				40 CFR		
		A	Kb	Db	VV		A	F	V	A	F	G	H	64	68	82
<i>There are no changes to applicable regulations with this permit modification application.</i>																

KEY TO MATRIX

- 1 (Applicable) The regulations have applicable requirements that apply to this particular emissions source. This includes any monitoring, recordkeeping, or reporting requirements.
- 2 (Exempt) The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
- 3 (Does Not Apply) The regulations do not apply to this emissions source. The regulations may have applicable requirements that could apply to this emissions source but the requirements do not currently apply to the source due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place.

Blank – The regulations clearly do not apply to this type of emission source.

TABLE 2: APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS

For each Emission Point ID Number:

- List each regulation that applies.
- Arrange the requirements imposed by each regulation according to the headings provided below.
- Repeat this process for each regulation that applies to each source.
- State-only Requirements should be noted as such in the appropriate column.

Source ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement	Existing Specific Req't No. (if any)	Action	In Air Req't's Library?
<i>This table only lists requirements that are being modified or clarified</i>								
6-90 EQT 0153 Package Boiler (ABCO)	40 CFR NSPS Subart Db	<i>Requirements that limit emissions or operations -</i> Nitrogen oxides ≤ 0.10 lb/MMBTU heat input (expressed as NO ₂), except as provided in 40 CFR 60.44b(k). The nitrogen oxide standards apply at all times, including periods of startup, shutdown, or malfunction. Subpart Db. [40 CFR 60.44b]	40 CFR 60.44b	Thirty-day rolling average	no	272	keep	Y
		<i>Requirements that specify monitoring -</i> Nitrogen oxides monitored by CMS continuously. Calculate nitrogen oxides emission rates as specified in 40 CFR 60.48b(d), except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(h)(1)]	40 CFR 60.48b(b)(1)	One-hour average	no		add	Y
		Oxygen or Carbon dioxide monitored by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(h)(1)]	40 CFR 60.48b(b)(1)	One-hour average	no		add	Y
		Operate NOx continuous monitoring systems and record data during all periods of operation except for continuous monitoring system breakdowns and repairs. Record data during calibration checks, and zero and span adjustments. Subpart Db. [40 CFR 60.48b(c)]	40 CFR 60.48b(c)		no		add	Y
		Follow the procedures under 40 CFR 60.13 and 40 CFR 60.48b(e)(1) through (e)(3) for installation, evaluation, and operation of the NOx continuous monitoring system. Subpart Db. [40 CFR 60.48b(e)]	40 CFR 60.48b(e)		no		add	N
		When nitrogen oxides emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks and zero and span adjustments, obtain emission data by using standby monitoring systems, 40 CFR 60, Appendix A, Method 7, Method 7a, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days. Subpart Db. [40 CFR 60.48b(f)]	40 CFR 60.48b(f)		no		add	Y
		Comply with the provisions of 40 CFR 60.48b(b), (c), (d), (e)(2), (e)(3), and (f), or monitor steam generating unit operating conditions and predict nitrogen oxides emission rates as specified in a plan submitted pursuant to 60.49b(c). Subpart Db. [40 CFR 60.48b(a)]	40 CFR 60.48b(g)		no	273	keep	Y
		Permit specific requirements pertaining to NOx and O ₂ CEMs become effective upon installation of the NOx analyzer in 1H2010.	40 CFR 60 Subpart Db		no		add	N

TABLE 2: APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS

Source ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement	Existing Specific Req't No. (if any)	Action	In Air Req't's Library?
6-90 EQT 0153 Package Boiler (ABCO)	40 CFR NSPS Subart Db	<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>						
		Nitrogen oxides recordkeeping by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(h)(1)]	40 CFR 60.48b(b)(1)		no		add	Y
		Oxygen or Carbon dioxide recordkeeping by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(h)(1)]	40 CFR 60.48b(b)(1)		no		add	Y
		Fuel rate recordkeeping by electronic or hard copy daily. Record the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for coal, distillate oil, residual oil, natural gas, wood, and municipal-type solid waste for the reporting period. Determine the annual capacity factor on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. Subpart Db. [40 CFR 60.49b(d)]	40 CFR 60.49b(d)		no		add	Y
		Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records of the information listed in 40 CFR 60.49b(g)(1) through (g)(10) for each steam generating unit operating day, except as provided under 40 CFR 60.49b(p). Subpart Db. [40 CFR 60.49b(g)]	40 CFR 60.49b(g)		no		add	Y
		<i>Requirements that specify reports to be submitted -</i>						
		Submit the performance test data from the initial performance test and the performance evaluation of the CEMS using the applicable performance specifications in 40 CFR 60 Appendix B to DEQ. Subpart Db. [40 CFR 60.49b(b)]	40 CFR 60.49b(b)		no		add	Y
		Submit excess emissions report: Due by the 30th day following the end of each six-month period. Report any excess emissions which occurred during the reporting period. Subpart Db. [40 CFR 60.49b(h)]	40 CFR 60.49b(h)		no	274	keep	Y
		Submit reports containing the nitrogen dioxide emission rate information recorded under 40 CFR 60.49b(g). Subpart Db. [40 CFR 60.49b(i)]	40 CFR 60.49b(i)		no	275	keep	Y
		<i>Requirements that specify performance testing -</i>						
		Determine compliance with the NOx standards in 40 CFR 60.44b through performance testing under 40 CFR 60.46b(e) or (f), or under 40 CFR 60.46b(g) or (h), as applicable. Subpart Db. [40 CFR 60.46b(c)]	40 CFR 60.46b(c)		no		add	Y
		Permit specific requirements pertaining to the 30-day performance test per 40 CFR 60.46b(e), become effective upon installation of the NOx CEMS in 1H2010.	40 CFR 60 Subpart Db		no		add	N
	40 CFR NSPS Subart A	All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A. [40 CFR 60]	40 CFR 60		no		add	Y

TABLE 2: APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS

Source ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement	Existing Specific Req't No. (if any)	Action	In Air Req't's Library?
1-06 EQT 0186 Rental Boiler (Holman)	40 CFR NSPS Subart Db	<i>Requirements that limit emissions or operations -</i>						
		Effective January 1, 2011, limit boiler operation to an annual capacity factor of 10 percent or less for natural gas.	40 CFR 60.44b(k)		no		add	N
		<i>Requirements that specify records to be kept and requirements that specify record retention time -</i>						
		Record and maintain records of the amount of each fuel combusted during each calendar month [40 CFR 60.49b(d)(2)]	40 CFR 60.49b(d)(2)		no		add	N
		Fuel rate recordkeeping by electronic or hard copy daily. Record the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for coal, distillate oil, residual oil, natural gas, wood, and municipal-type solid waste for the reporting period. Determine the annual capacity factor on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. Subpart Db. [40 CFR 60.49b(d)]	40 CFR 60.49b(d)		no	280	delete-not req'd for <10% capacity boilers	Y
		Maintain all records required under 40 CFR 60.49b for a period of 2 years following the date of such record. Subpart Db. [40 CFR 60.49b(o)]	40 CFR 60.49b(o)		no	281	delete - superceded by Part 70 General Condition I	Y
		Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records of the calendar date, the number of hours of operation, and the hourly steam load for each steam generating unit operating day. Subpart Db. [40 CFR 60.49b(p)]	40 CFR 60.49b(p)		no	282	keep	Y
		<i>Requirements that specify reports to be submitted -</i>						
		Submit the maximum heat input capacity data from the demonstration of the maximum heat input capacity of the affected facility to DEQ. Subpart Db. [40 CFR 60.49b(b)]	40 CFR 60.49b(b)		no	279	keep	Y
		Submit a report to DEQ containing the annual capacity factor over the previous 12 months, the average fuel nitrogen content during the reporting period if residual oil was fired, and all other applicable information per 40 CFR 60.49b(q)(1) through (q)(3). Subpart Db. [40 CFR 60.49b(q)]	40 CFR 60.49b(q)		no	283	keep	Y
	40 CFR NSPS Subart A	All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A. [40 CFR 60]	40 CFR 60		no		add	Y

TABLE 2: APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS

Source ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement	Existing Specific Req't No. (if any)	Action	In Air Req't's Library?
Fug-TS FUG 0003 Treatment Services Fugitive Emissions	LAC 33:III.Chapter 51	<i>Requirements that specify monitoring -</i>						
		Pumps in light liquid service: Presence of a leak monitored by visual inspection/determination weekly (calendar), as specified in Paragraph D.1.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If there are indications of liquids dripping from the pump seal, monitor within 5 days by the methods specified in Subsection P.2. [LAC 33:III.5109.A]	LAC 33:III.5109.A	weekly	yes	183	delete - does not apply to pumps with dual mechanical seals	Y
		Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar), as specified in Paragraph D.4.d of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate repair provisions specified in Paragraphs D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1. [LAC 33:III.5109.A]	LAC 33:III.5109.A	weekly	yes		add	Y

TABLE 3: APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS

Source ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
<i>There are no changes to exempt status or non-applicability from the current permit .</i>				

TABLE 4: APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS

Enter each single emission point that routes its emissions to another source (i.e., a control device) or a common stack, or is part of an Emissions Cap. List the emissions source to which each single emission point is routed or the Cap of which the source is a member, if applicable. Consult instructions.

Source ID	Description	Construction Date	Routes to:	Operating Rate/Volume	Applicable Requirement(s)?
					Y/N
	<i>There are no changes to the equipment list.</i>				Y/N
					Y/N
					Y/N

SECTION 4.0

**EMISSION INVENTORY QUESTIONNAIRE FOR AIR
POLLUTANTS**

4-1

4-2

4-3

4-5

4-6

SECTION 5.0
EMISSION CALCULATIONS

Gasoline Storage Tank
EQ 28

Inputs to Tanks Program

Type of Tank	horizontal
shell length (ft)	6.0
diameter (ft)	5.33
Volume (gals)	1000
Turnovers per year	10
Net Throughput (gals/yr)	10,000
Is Tank Heated?	N
Shell Color/Shade	gray/medium
shell condition	good
vacuum settings (psig)	-0.03125
pressure settings (psig)	0.50
contents	gasoline (RVP 10)

Results From Tanks Program

Annual Emissions (lbs/yr) ¹	577.66
--	--------

Pollutant Speciation

	Vapor Weight % ²	Average (lb/hr)	Annual (tons/yr)
Hexane (Total)	1.6	0.0011	0.005
Benzene	0.9	0.0006	0.0026
Toluene	1.3	0.0009	0.004
2,2,4 Trimethyl- pentane	0.8	0.0005	0.0023
Ethylbenzene	0.1	0.00007	0.00029
Xylenes	0.5	0.0003	0.0014
Total VOC		0.07	0.29

References:

¹ From TANKS 4.0.9d Emissions Reports.

² *Compilation of Air Emission Factors for Petroleum Distribution and Retail Marketing Facilities*, Table 3-3, Average Vapor Phase HAP Fractions of Gasoline Products, 9/95.

TANKS 4.0.9d
Emissions Report - Summary Format
Tank Identification and Physical Characteristics

Identification

User Identification:	Gasoline Tank - new permit
City:	Baton Rouge
State:	Louisiana
Company:	Rhodia
Type of Tank:	Horizontal Tank
Description:	

Tank Dimensions

Shell Length (ft):	6.00
Diameter (ft):	5.33
Volume (gallons):	1,000.00
Turnovers:	10.00
Net Throughput(gal/yr):	10,000.00
Is Tank Heated (y/n):	N
Is Tank Underground (y/n):	N

Paint Characteristics

Shell Color/Shade:	Gray/Medium
Shell Condition	Good

Breather Vent Settings

Vacuum Settings (psig):	-0.03
Pressure Settings (psig)	0.50

Meteorological Data used in Emissions Calculations: Baton Rouge, Louisiana (Avg Atmospheric Pressure = 14.72 psia)

TANKS 4.0.9d
Emissions Report - Summary Format
Liquid Contents of Storage Tank

Gasoline Tank - new permit - Horizontal Tank
Baton Rouge, Louisiana

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.	Max.		Avg.	Min.	Max.					
Gasoline (RVP 10)	All	77.03	66.57	87.49	70.76	7.1395	5.8808	8.6035	88.0000			92.00	Option 4: RVP=10, ASTM Slope=3

TANKS 4.0.9d
Emissions Report - Summary Format
Individual Tank Emission Totals

Emissions Report for: Annual

Gasoline Tank - new permit - Horizontal Tank
Baton Rouge, Louisiana

Components	Losses(lbs)		
	Working Loss	Breathing Loss	Total Emissions
Gasoline (RVP 10)	112.19	465.47	577.66

Package Boiler
EIQ 6-90

Op. Schedule = 8760 hrs per year
 Average heat input = 50 MMBtu/hr
 Maximum heat input = 106 MMBtu/hr
 Heating Value of Natural Gas = 1040 BTU/scf
 Molecular Weight of S = 32 lbs/lbmole
 Molecular Weight of SO₂ = 64 lbs/lbmole

Pollutant	Basis	Sulfur Concentration (gr/100 scf)	Average Emissions (lbs/hr)	Maximum Emissions (lbs/hr)	Annual Emissions (tpy)
PM-10	1		0.60	1.27	2.63
Sulfur Dioxide	2	2	0.27	0.58	1.20
Nitrogen Oxides	3,4		4.00	21.20	17.52
Carbon Monoxide	1		8.85	18.76	38.76
VOCs	1		1.40	2.97	6.13

Notes:

¹ Based on letter from Gordon-Piatt Energy Group, the vendor, adjusted for firing rate, file 402.2.2.

² Based on the assumption of total conversion of S to SO₂.

³ Average (based on letter from the vendor) 0.08 lb/MMBTU

⁴ Maximum (assume on short-term basis, could be 2X the NSPS Db 30-day rolling average limit) 0.20 lb/MMBTU

Sulfuric Acid Plant Cooling Towers
EQ M1a and M1b

The PM₁₀ emission rate is calculated using 1.7 lb/1000 gal total liquid drift factor for induced draft tower (AP-42 Table 13.4-1)

PM₁₀ emission rate = (Total Liq. Draft Factor) x (TDS) x (Recirculation Rate)

Description	EQ ID	Recirculation Rate (gpm)	TDS ¹ (ppm)	Average PM-10 Emissions ² (lb/hr)	Annual PM-10 Emission (tpy)
Unit 1 Cooling Tower	M1b	16,000	3,500	5.71	25.01
Unit 2 Cooling Tower	M1a	36,000	3,500	12.85	56.28

¹ Conservative estimate based on samples collected in December 2009.

² PM₁₀ emission rate = (Total Liq. Draft Factor) x (TDS) x (Recirculation Rate)
where total liquid drift factor for induced draft tower = 1.7 lb/1000 gal (AP-42 Table 13.4-1)

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Sulfuric Acid Plant

Unit: Sulfuric Acid Plant
EQ I.D.: M10
Description: Diesel Fire-Water Pump 20G961

Hours/Year: 500
Horsepower: 200

	Emission Factor* lb/hp-hr	Emissions	
		lbs/hr	tpy
PM-10	0.0022	0.44	0.11
SOx	0.00205	0.41	0.10
NOx	0.031	6.20	1.55
CO	0.00668	1.34	0.33
VOC	0.0025141	0.50	0.13

*Per AP-42 Table 3.3-1, 10/96

SECTION 6.0
CERTIFICATE OF GOOD STANDING



Louisiana Secretary of State
COMMERCIAL DIVISION
Corporations Database



*Louisiana Secretary of State
Detailed Record*

Charter/Organization ID: 34605553F

Name: RHODIA INC.

Type Entity: Business Corporation (Non-Louisiana)

Status: Active

Annual Report Status: In Good Standing **Add Certificate of Good Standing to Shopping Cart**

Last Report Filed on 02/09/2007

Mailing Address: 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Domicile Address: 1209 ORANGE STREET, WILMINGTON, DE 19801

Principal Office: 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Principal Bus. Est. in Louisiana: 1275 AIRLINE HIGHWAY, BATON ROUGE, LA 70805

Qualified: 01/13/1998

Registered Agent (Appointed 1/13/1998): C T CORPORATION SYSTEM, 8550 UNITED PLAZA BLVD., BATON ROUGE, LA 70809

President: JAMES HARTON, 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Director: JAMES HARTON, 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

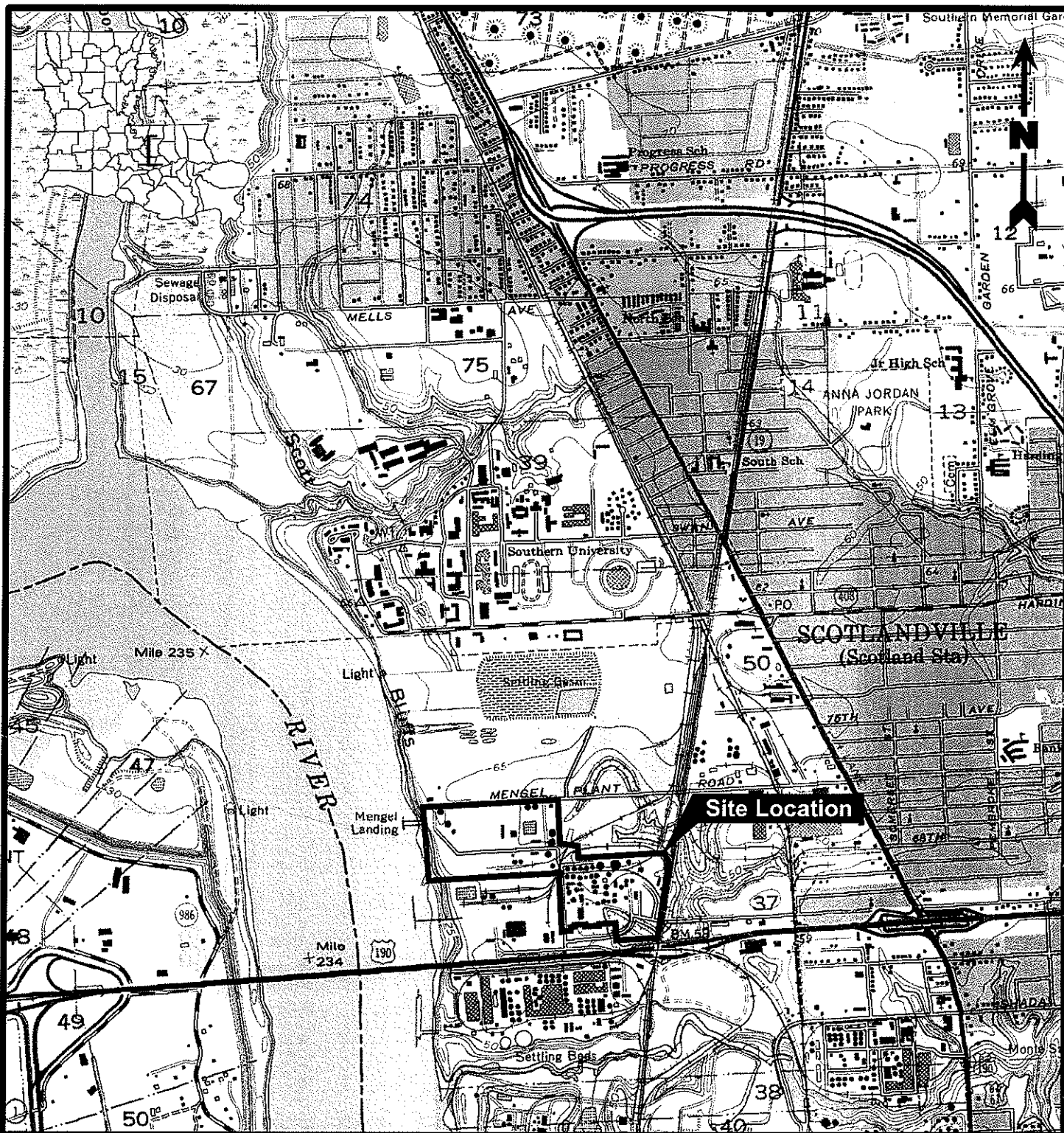
Vice President: JERRY KRING, 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Vice President: JOHN P. DONAHUE, 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Secretary: JOHN P. DONAHUE, 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Additional officers may exist on document

FIGURE 1
SITE LOCATION MAP



0 1,000 2,000 4,000
Feet

Site Location Map

East Baton Rouge Parish

Rhodia Inc.
Baton Rouge, Louisiana



PROVIDENCE
ENGINEERING & ENVIRONMENTAL GROUP LLC

Reference

Base map comprised of U.S.G.S. 7.5 minute topographic map, "Scotlandville, LA" dated 1963 revised 1994. Image is referenced to UTM NAD 83 Zone 15.

Doc. Code: 015-003

Drawn: LMH

Dwg. No.: 015-003-A020

Checked:

Approved:

Date: 02/02/05

1
Figure

L100 V7
(2012)

**AIR, PESTICIDES, AND TOXICS
6TH FLOOR RECORDS CENTER
INFILE / NEW FILE FORM**

New file: ☐

or

Infiling: ☒

Choose from the file types below:

Air Facility

- ☐ AR- Acid Rain
- ☐ CB- Confidential Business
- ☐ CO- Compliance
- ☐ EN- ** Enforcement
- ☐ GE- General
- ☒ PE- Permit
- ☐ RA- Regulatory Applicability
- ☐ Other:

TSCA

- ☐ AH - Asbestos Hazard Emergency Response Act
- ☐ AS or AW - Asbestos or Asbestos Worker Prot.
- ☐ CB - Confidential
- ☐ SI - Site Specific
- ☐ FO - Non Site Specific
- ☐ IM - ** Section 5 * 8
- ☐ LB - ** Lead
- ☐ PC - **PCB

** Extension of File Type (if needed):

- ☐ ES - Enforcement Sensitive
- ☐ DP - Docket Number

☐ **EPCRA / SARA**

☐ **FIFRA**

Proj No:	10
LDEQ AI:	1314

Permit Type	Number
Minor Pmt No:	
PSD Pmt No:	
TV Pmt No:	0840-00033-V5
NNSR Pmt No:	
CAIR Pmt No:	
AR Pmt No:	

FRS Number:

Company Name:

Site Name:

Area Name:

Fac Street:

Fac City:

Fac Cnty:

Fac State:

Fac Zip:

Requestor's Name:

Requestor's Phone:

Materials Sent To File Room

Application:

Format:

Permit(s):

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No. 7005 1820 0002 2092 3155

Activity No.: PER20120011
Agency Interest No. 1314

Mr. Daniel Tate
Plant Manager
Rhodia, Inc.
P.O. Box 828
Baton Rouge, La 70821

RE: Part 70 Operating Permit
Rhodia Inc
Baton Rouge, East Baton Rouge Parish, Louisiana

Dear Mr. Tate:

This is to inform you that the permit modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the 11th of May, 2016, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this 8 day of November, 2012.

Permit No.: 0840-00033-V5

Sincerely,

Sam L. Phillips
Assistant Secretary
SLP:EMC
c: EPA Region VI ✓

RECEIVED
12 NOV 13 PM 5:31
AIR PERMITS SECTION
6PD-R

CPD-R
AND FBI SECTION
151.1.1 M-21
100-100000

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Rhodia Inc
Agency Interest No.: 1314
Rhodia Inc
Baton Rouge, East Baton Rouge Parish, Louisiana

I. Background

Rhodia Inc. (Rhodia) operates a Sulfuric Acid Plant located in Baton Rouge, East Baton Rouge Parish, Louisiana. The facility produces sulfuric acid by using two sulfuric acid production trains (Unit No. 1 and Unit No. 2). Unit No. 1 was constructed in 1953 and Unit No. 2 was constructed in 1968. Previously the facility operated under Title V Permit 0840-00033-V0 dated October 12, 2005, Title V General Permit No. 3032-V1 issued December 13, 2006 for the Package Boiler, Title V Permit 0840-00033-V1 issued March 14, 2007 which consolidated the Package Boiler and Sulfuric Acid permits, Title V Permit 0840-00033-V2 issued November 30, 2009, and Title V Permit 0840-00033-V3 issued May 11, 2011. Currently the facility operates under Title V Permit 0840-00033-V4 dated March 15, 2012.

Rhodia has entered into a Consent Decree (Civil Action No. 2:07CV134 WL) with the United States and various State parties including Louisiana, effective July 23, 2007. This Consent Decree requires Rhodia to install controls for SO₂ emissions at their various plant sites nation wide. The requirements for the Baton Rouge Facility have been incorporated into this permit.

II. Origin

A permit application and Emission Inventory Questionnaire were submitted by Rhodia, Inc. on September 7, 2012 requesting a Part 70 operating permit.

III. Description

Sulfuric Acid Plant

Rhodia receives spent sulfuric acid and hazardous waste fuels from off-site sources and recovers the sulfur and energy values in its industrial furnaces, forming fresh sulfuric acid. The sulfuric acid production process begins with treatment of the feed streams in the industrial furnace. Liquids are sprayed using atomizers into the combustion chamber. Normal operating conditions are 2% to 4% excess furnace oxygen and furnace temperature between 1800°F and 2200°F at the furnace discharge. Furnace residence time is approximately three seconds. The feed streams are producing steam for process use. Gas from the waste heat boiler is further cooled and cleaned in the gas scrubbing system. This system includes spray scrubbing and wet electrostatic precipitators to remove acid mist and particulate emissions.

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Cooling systems reduce the gas temperature from 600°F to 100°F. The wet gas is then dried through counter-current packed flow columns circulating $\geq 93\%$ sulfuric acid. Dry gas is heated to 800°F before the sulfur dioxide is converted to sulfur trioxide using catalyst. Because the conversion step to sulfur trioxide is exothermic, the hot exhaust gas is used to heat up the incoming feed by cross-current heat exchange.

Sulfur trioxide from the converter enters a countercurrent packed absorption tower. Strong sulfuric acid absorbs and hydrolyzes the sulfur trioxide to sulfuric acid. Demisters then remove sulfuric acid mist generated in the acid tower and particulate emissions.

The preceding process description pertains to Unit No. 1. The Unit No. 2 process is slightly different. After the drying step, the gas enters a second sulfur burning furnace, followed by a hot gas filter. This added step heats the gas, affording a second occasion for combustion. Unit No. 2 has over twice the capacity of Unit No. 1. Equipment is sized proportionately, with Unit No. 2 having a longer residence time.

Waste Storage

Seven tanks have been constructed specifically for the storage of hazardous waste. These seven tanks are located in the truck and rail unloading facility and operate under a nitrogen pad. A positive pressure vent system is tied into Unit No. 2 or to the TS Vapor Combustor to burn all fumes and vapors.

Package Boiler

The package boiler provides backup and supplemental steam production to Units No. 1 and No. 2. It is rated for 80,000 lbs/hr steam production with a heat input of 106 MM BTU/hr and is permitted for an annual average heat input of 50 MM BTU/hr. It is fired with natural gas only and is equipped with low-NOx burners and a continuous flue gas oxygen analyzer.

Rental Boiler

The rental boiler provides backup steam production to Units No. 1 and No. 2 and the package boiler. It is fired with natural gas only and has a maximum firing rate of 133 MM BTU/hr but is limited to a calendar average firing rate of 12.4 MM BTU/hr per 40 CFR 60.44b(j)(2).

SO₂ Abatement Scrubbers and Debottlenecking Project

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Rhodia Inc
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Rhodia Inc
Baton Rouge, East Baton Rouge Parish, Louisiana

As part of Rhodia's consent decree for the Baton Rouge facility, Rhodia has installed packed bed scrubbers on Sulfuric Acid Unit No. 1 and Unit No. 2 to control SO₂ emissions. Also as part of the consent decree, the Environmental Protection Agency (EPA) agreed to allow the Sulfuric Acid Plant to undergo an expansion project. This project will allow the facility to increase its total Sulfuric Acid (H₂SO₄) production from 2,200 tons/day to 2,800 tons/day. Specifically, the capacity of Sulfuric Acid Unit No.1 (EPN 3) will increase from 700 tons/day to 900 tons/day of sulfuric acid, and the capacity of Sulfuric Acid Unit No. 2 (EPN 2) will increase from 1,500 tons/day to 1,900 tons/day. The capacity increase will be accomplished with a series of debottlenecking projects.

Rhodia is requesting the following changes with this permit modification.

1. Reconcile emissions for sulfur feed tank (EQT 0146) to incorporate test results from February 2012.
2. Modify stack physical characteristics for Unit 1 Pre-heater stack (EQT 0140) as it will be replaced in March of 2013.
3. Reconcile SO₂ emissions to use the AP-42 factor instead of sulfur content of natural gas.
4. Reconcile PM₁₀ and NO_x emissions for the Acid Plant Vapor Combustor (EQT 0151) using new natural gas usage data from a recently installed natural gas meter.
5. Update stack discharge characteristics for the TS Vapor Combustor (EQT 0147) and Acid Plant Vapor Combustor (EQT 0151) based on recent testing.
6. Modify PM₁₀ emissions for Oleum Loading Vent Scrubber (EQT 0142), Oleum Barge Loading Scrubber (EQT 0149), and Acid Plant Fugitive Emissions (FUG 0002).
7. Update stack gas characteristics for Oleum Barge Loading Scrubber (EQT 0149).
8. Reconcile General Condition XVII Activities table.
9. Update specific requirements.

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	58.43*	58.95*	+0.52
SO ₂	1078.06	1077.96	-0.10
NO _x	118.64	118.64	-
CO	103.81	103.81	-
VOC	29.60	29.87	+0.27
HAPs ¹	9.18	9.41	+0.23

*Includes sulfuric acid mist

¹See Tables A and B for more information on HAP limits

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Rhodia Inc
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Rhodia Inc
Baton Rouge, East Baton Rouge Parish, Louisiana

LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
2,6-Dinitrotoluene	0.04	0.04	-
Ammonia	0.56	0.56	-
Barium (and compounds)	0.18	0.18	-
Chlorine dioxide	0.01	0.01	-
Copper (and compounds)	0.11	0.11	-
Diaminotoluene (mixed isomers)	0.12	0.12	-
Hydrogen sulfide	0.49	2.21	+1.72
Nitric acid	0.14	0.14	-
Pyridine	0.56	0.56	-
Sulfuric Acid	42.38	42.38	-
Toluene-2,6-Diisocyanate	0.01	0.01	-
Zinc (and compounds)	0.22	0.22	-
n-butyl alcohol	1.00	1.00	-
Total TAPs	45.82	47.54	+1.72

Table A – Permitted HAP Emissions

Source	ID	HAPs (tpy)	How Determined
SAU	GRP 0002	5.694	Sum of individually permitted HAPs in Emission Rate Tables
Sulfur Feed Tank	EQT 0146	0.29	Sum of individually permitted HAPs in Emission Rate Tables
TS Vapor Combustor	EQT 0147	0.38	Sum of individually permitted HAPs in Emission Rate Tables
AP Vapor Combustor	EQT 0151	0.41	Sum of individually permitted HAPs in Emission Rate Tables
Gasoline Tank	EQT 0152	0.06	Sum of individually permitted HAPs in Emission Rate Tables
TS Process	PCS 0002	2.02	Cap on HAPs for process group in specific requirements; see Table B for list of HAPs included in cap.
Spent Acid Process	PCS 0001	0.56	Cap on HAPs for process group in specific requirements; see Table B for list of HAPs included in cap.
Total		9.41*	*Lead Compounds included in HAPs total

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Rhodia Inc
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Rhodia Inc
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Table B List of HAPs Included in HAP Caps for PCS 0001 and PCS 0002

Pollutant Type	Pollutant		
VOC	1,1,2,2-Tetrachloroethane	Captan	Methyl bromide
	1,1,2-Trichloroethane	Carbaryl	Methyl chloride
	1,1-Dichloroethane	Carbon disulfide	Methyl ethyl ketone
	1,1-Dimethylhydrazine	Carbon tetrachloride	Methyl isobutyl ketone
	1,2,4-Trichlorobenzene	Carbonyl sulfide	Methyl methacrylate
	1,2-Dibromo-3-chloropropane	Chlordane	Methylene diphenyl diisocyanate
	1,2-Dibromoethane	Chlorinated dibenzo-p-dioxins	Monomethyl hydrazine
	1,2-Dichloroethane	Chlorinated dibenzo furans	N,N-Diethyl aniline
	1,2-Dichloropropane	Chloroacetic acid	N,N-dimethylbenzenamine
	1,2-Diphenylhydrazine	Chlorobenzene	N-Nitroso-N-Methylurea
	1,2-Epoxybutane	Chloroethane	N-Nitrosodimethylamine
	1,2-Epoxyethylbenzene	Chloroform	N-Nitrosomorpholine
	1,2-Oxathiolane 2,2-dioxide	Chloromethyl methyl ether	Naphthalene (and Methylnaphthalenes)
	1,3-Butadiene	Chloroprene	Nitrobenzene
	1,3-Dichloropropene	Cresol	Parathion
	1,4-Dichlorobenzene	Cumene	Pentachloronitrobenzene
	1,4-Dioxane	Diazomethane	Phenol
	2,2'-dichlorodiethylether	Dibutyl phthalate	Phosgene
	2,2,4-Trimethylpentane	Dichlorvos	Phthalic Anhydride
	2,4,5-Trichlorophenol	Diethanolamine	Polychlorinated biphenyls
	2,4,6-Trichlorophenol	Diethyl Sulfate	PAH
	2,4-Dichlorophenoxyacetic Acid	Dimethyl formamide	Propionaldehyde
	2,4-Dinitrophenol	Dimethyl phthalate	Propoxur
	2,4-Dinitrotoluene	Dimethyl sulfate	Propylene oxide
	2,4-Toluene diamine	Dimethylcarbamoyl chloride	Propylenimine
	2-Acetylaminofluorene	Epichlorohydrin	Pyrocatechol
	2-nitro-Propane	Ethyl 4,4'-Dichlorobenzilate	Quinoline
	3,3'-Dichlorobenzidine	Ethyl Acrylate	Quinone
	4,4'-Methylenebis-(2-Chloroaniline)	Ethyl benzene	Styrene
	4,4'-Methylenebisbenzeneamine	Ethylene glycol	Toluene
	4,6 Dinitro-o-cresol	Ethylene oxide	Toluene-2,4-diisocyanate
	4-Aminodiphenyl	Ethyleneimine	Toxaphene
	4-Dimethylaminoazobenzene	Ethylenethiourea	Trichloroethylene
	4-Nitrobiphenyl	Formaldehyde	Triethyl amine
	4-Nitrophenol	Glycol ethers (Table 51.1)	Trifluralin
	Acetaldehyde	Glycol ethers (Table 51.3)	Urethane
	Acetamide	Heptachlor	Vinyl acetate

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	Acetonitrile	Hexachlorobenzene	Vinyl bromide
	Acetophenone	Hexachlorobutadiene	Vinyl chloride
	Acrolein	Hexachlorocyclopentadiene	Vinylidene chloride
	Acrylamide	Hexachloroethane	Xylene (mixed isomers)
	Acrylic acid	Hexamethylene diisocyanate	alpha-Chloroacetophenone
	Acrylonitrile	Hexamethylphosphoramide	beta-Propiolactone
	Allyl chloride	Hydrazine	bis(2-ethylhexyl)phthalate
	Amiben	Hydroquinone	bis(Chloromethyl)ether
	Aniline	Iodomethane	n-Hexane
	Benzene	Isophorone	o-Aminoanisole
	Benzidine	Lindane	o-dianisidine
	Benzotrichloride	Maleic anhydride	ortho-Tolidine
	Benzyl chloride	Methanol	ortho-Toluidine
	Biphenyl	Methoxychlor	p,p'-DDE
	Bromoform	Methyl Isocyanate	para-Phenylenediamine
	Butene (mixed isomers)	Methyl Tertiary Butyl Ether	pentachloro-Phenol
Non-VOC	1,1,1-Trichloroethane	Hydrogen cyanide	Tetrachloroethylene
	Calcium cyanamide	Hydrofluoric acid	Titanium tetrachloride
	Cyanide compounds	Phosphine	
	Dichloromethane	Phosphorus, Total (as P)	

IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations. Prevention of Significant Deterioration (PSD), New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) do not apply.

This facility is a major source of criteria pollutants. The facility is also a major source of Toxic Air Pollutants (TAPs) under LAC 33:III.Chapter 51. The facility is not a major source of Hazardous Air pollutants (HAPs); however, wastewater and wastewater residuals from facilities subject to 40 CFR 63 Subpart G and other MACT standards or NSPS may be treated at the facility. Therefore, the Sulfuric Acid Plant complies with any applicable provisions of these MACT/NSPS standards.

Permit Shield

Per 40 CFR 70.6(f) and LAC 33:III.507.I, a permit shield has been determined for the referenced facility as follows:

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LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Rhodia Inc
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Rhodia Inc
Baton Rouge, East Baton Rouge Parish, Louisiana

1. Per 40 CFR 60.8(c), emissions in excess of a standard are not in violation during startup, shutdown, or malfunction events. Further, per 40 CFR 60.11(c), the opacity standards do not apply during periods of startup, shutdown, and malfunction. Rhodia's Consent Decree defines startup as, "the 24-hour period at any sulfuric acid plant beginning when the feed of sulfur or sulfur-bearing materials, excluding conventional fossil fuels such as natural gas or fuel oils, to the furnace commences after a main gas blower shutdown" but there is no such definition in 40 CFR 60 Subpart H. Therefore, Rhodia has requested a permit shield to use the Consent Decree definition of "startup" for determining compliance with the 40 CFR 60 Subpart H 10% opacity limit and the 0.15 lbs/ton limit.
2. The Unit No. 1 and Unit No. 2 furnaces are treatment processes for certain waste streams regulated under 40 CFR 61 Subpart FF (Benzene Waste NESHAP). Per 40 CFR 61.348(e) certain requirements apply if the treatment process has any openings (e.g., access doors, hatches, etc.)

The furnaces operate at less than atmospheric pressure which is continuously monitored. Annual inspections per 61.348(e)(3)(ii) are conducted. Frequent inspections and repairs are conducted to minimize any cracks and unsealed openings. Very small openings may go undetected and/or not be repaired because the furnaces operate under vacuum. Occasionally, the furnaces may experience a short-term positive pressure when introducing a new feed to the furnace. This issue was reviewed with LDEQ for the recently issued BIF permit. The BIF permit requires that furnace pressure be maintained at -0.1 inches of water maximum, 10-second delay. The 10-second delay is allowed to normalize the pressure before automatically shutting down feeds to the furnace.

Rhodia requested a permit shield that allows compliance with 61.348(e) to be demonstrated by maintaining furnace pressure at -0.1 inches of water maximum, 10-second delay and operating furnace openings with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 61.355(h).

3. For the Treatment Services Fugitive Emissions (EIQ FUG-TS), per the Louisiana Fugitive Emissions Program Consolidation Guidelines, Rhodia follows a streamlined fugitive monitoring program with the Louisiana MACT Determination for Non-HON sources as the most stringent program. Rhodia has reduced site-wide permitted emissions of all class I and II TAPs emitted from source FUG-TS to below

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**Rhodia Inc
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Rhodia Inc
Baton Rouge, East Baton Rouge Parish, Louisiana**

their MERs. Thus, LA Non-HON MACT no longer applies. However, Rhodia is voluntarily choosing to continue to comply with the LA Non-HON MACT since the program is already in place. Therefore, Rhodia is requesting a permit shield to ensure that complying with LA Non-HON MACT still ensures compliance with the underlying programs that were consolidated (40 CFR 264 Subpart BB and 40 CFR 61 Subpart V).

4. Rhodia requested a permit shield stating that compliance with the NSPS Subpart H acid mist and opacity standards constitutes compliance with the LAC 33:III.Chapter 15 acid mist standard and the LAC 33:III.1311.C opacity standard and that compliance with the SO₂ standard in the permit (long-term and short-term limits which are lower than the Subpart H standard of 4.0 lbs/ton) constitutes compliance with the LAC 33:III.Chapter 15 SO₂ standard. "Standard" in this context includes all monitoring, recordkeeping, reporting, and testing. This permit shield is effective upon permit issuance for Unit 2 for all three pollutants and for Unit 1 for acid mist. It becomes effective for Unit 1 SO₂ and opacity when the more stringent standards become effective on May 1, 2012

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. Public Notice

Public notice is not required for a minor modification to a Part 70 Operating Permit.

VII. Effects on Ambient Air

Emissions associated with the proposed modification were reviewed by LDEQ to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model

AIR PERMIT BRIEFING SHEET
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Rhodia Inc
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Rhodia Inc
Baton Rouge, East Baton Rouge Parish, Louisiana

emissions for this permit modification. However, LDEQ did require modeling for the 0840-00033-V2 permit, which the facility submitted on October 6, 2008. The results are presented below.

Dispersion Model(s) Used: ISCT3

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
Chlorine	8-Hour	18.95 $\mu\text{g}/\text{m}^3$	35.7 $\mu\text{g}/\text{m}^3$
Hydrochloric acid	8-Hour	79.75 $\mu\text{g}/\text{m}^3$	180 $\mu\text{g}/\text{m}^3$
Hydrogen Sulfide	8-Hour	264.82 $\mu\text{g}/\text{m}^3$	330 $\mu\text{g}/\text{m}^3$
Sulfuric acid	8-Hour	22.32 $\mu\text{g}/\text{m}^3$	23.8 $\mu\text{g}/\text{m}^3$
MIBK	8-Hour	323 $\mu\text{g}/\text{m}^3$	4880 $\mu\text{g}/\text{m}^3$
Dichloromethane	Annual	0.86668 $\mu\text{g}/\text{m}^3$	212.77 $\mu\text{g}/\text{m}^3$
Acrylonitrile	Annual	1.152 $\mu\text{g}/\text{m}^3$	1.47 $\mu\text{g}/\text{m}^3$
1,3-Butadiene	Annual	0.723 $\mu\text{g}/\text{m}^3$	0.92 $\mu\text{g}/\text{m}^3$
Antimony	8-Hour	0.46624 $\mu\text{g}/\text{m}^3$	11.90 $\mu\text{g}/\text{m}^3$
Arsenic	Annual	0.00004 $\mu\text{g}/\text{m}^3$	0.02 $\mu\text{g}/\text{m}^3$
Barium	8-Hour	0.88404 $\mu\text{g}/\text{m}^3$	11.90 $\mu\text{g}/\text{m}^3$
Chromium VI	Annual	0.00004 $\mu\text{g}/\text{m}^3$	0.01 $\mu\text{g}/\text{m}^3$
Copper	8-Hour	0.40913 $\mu\text{g}/\text{m}^3$	23.80 $\mu\text{g}/\text{m}^3$
Manganese	8-Hour	0.27827 $\mu\text{g}/\text{m}^3$	4.76 $\mu\text{g}/\text{m}^3$
Nickel	Annual	0.00004 $\mu\text{g}/\text{m}^3$	0.21 $\mu\text{g}/\text{m}^3$
Selenium	8-Hour	0.35001 $\mu\text{g}/\text{m}^3$	4.76 $\mu\text{g}/\text{m}^3$
Zinc	8-Hour	0.80561 $\mu\text{g}/\text{m}^3$	119.00 $\mu\text{g}/\text{m}^3$
SO ₂ *	Annual	21.88 $\mu\text{g}/\text{m}^3$	(80 $\mu\text{g}/\text{m}^3$)
*Phase I emissions	24-Hour	335.04 $\mu\text{g}/\text{m}^3$	(365 $\mu\text{g}/\text{m}^3$)
(worst case)	3-Hour	1017.57 $\mu\text{g}/\text{m}^3$	(1300 $\mu\text{g}/\text{m}^3$)

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Rhodia Inc
Agency Interest No.: 1314
Rhodia Inc
Baton Rouge, East Baton Rouge Parish, Louisiana

VIII. General Condition XVII Activities

ID No.	Work Activity	Schedule	Emission Rates – tons					Other
			PM ₁₀	SO ₂	NO _x	CO	VOC	
GC1	Catalyst reconditioned in Sulfuric Acid Unit Nos. 1 & 2	Once each 12 months per unit	0.2					
GC2	Drum re-packaging	4 times per year					0.002	
GC3	Vacuum trucks used for tank cleanouts, spill cleanup, and sump clean out	Weekly		0.06			0.06	
GC4	Tank and process equipment cleaning			0.1			0.90	
GC5	Opening of truck and railcars containing waste fuel and spent acid for sampling, inspection, maintenance, or further processing	Daily		0.5			0.1	
GC6	Sampling waste fuel trucks, railcars, and tanks via sample tap	10 times per day					0.03	##
GC7	Sampling spent acid and IFS trucks, railcars, and barges	8 times per day		0.004			0.004	
GC9	Odor-neutralizing compounds						0.06	
GC10	Manual gauging of tank levels			0.5			0.1	
GC11	Melting sulfur solidified in piping and other equipment at the old sulfur pit (formerly EIQ 18)			<0.001				<0.001 [#]
GC12	Sampling for moisture content, stack gauging, and pressure readings from gas streams		0.1*	0.1				0.1*
GC13	Loading fresh acid onto heel of spent acid			0.003			0.004	
GC14	Maintenance that requires shutdown or bypass of Acid Plant Vapor Combustor (APVC)	240 hours per year (max)					4.62	**
GC15	Unloading containers of spent acid with chlorinated VOCs (carbon bed for VOCs, caustic scrubber if any SO ₂ present)	1 per week		0.1			0.06	**

*Sulfuric Acid Mist

#Hydrogen Sulfide

** VOC Speciation similar to Spent Acid Process permitted emissions

VOC Speciation similar to TS Process permitted emissions

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Rhodia Inc
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Rhodia Inc
Baton Rouge, East Baton Rouge Parish, Louisiana

IX. Insignificant Activities

ID No.	Description	Operating Rate (Max) or Tank Capacity	Regulation
20D962	Diesel Storage Tank, Firewater Pump	300 gal	LAC 33:III.501.B.5.A.3
90D360	Diesel Storage Tank, Maintenance	1000 gal	LAC 33:III.501.B.5.A.3
	Diesel Storage Tank, IFS	1000 gal	LAC 33:III.501.B.5.A.3
91D321	IFS Wash-water Storage Tank	9000 gal	LAC 33:III.501.B.5.A.3
90D210	Laboratory Excess Sample Tank	100 gal	LAC 33:III.501.B.5.A.2
Hoods	Different Analyses*	N/A	LAC 33:III.501.B.5.A.6
	Drum Washing Operations	55 gal	LAC 33:III.501.B.5.A.7
	Temporary (seasonal) Portable Gasoline Tank	550 gals	LAC 33:III.501.B.5.A.8

*Vents associated with exhaust hoods for laboratory equipment used exclusively for routine chemical and physical analysis with the purpose of quality control or environmental monitoring purposes.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

**Rhodia Inc
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**Rhodia Inc
Baton Rouge, East Baton Rouge Parish, Louisiana**

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements																				
ID No.:	Description	LAC 33:III.Chapter																		
		5 [▲]	9	11	13	15	1701	2103	2107	2108	2111	2113	2115	2121	2122	2147	2153	51*	56	59*
UNF002	Facility Wide	1	1	1	1							1						1	1	1
ARE002	M4 – West End Sump																			
ARE003	M3 - Treatment Services Sumps																			
EQT008	30D260 – Spent Acid Tank							2												
EQT140	10 – Preheater; Acid Unit No. 1			1	1	2														
EQT141	11 – Lime Silos				1															
EQT142	12 – Oleum Loading Vent Scrubber	1																1		
EQT146	20 – Sulfur Feed Tank					2														
EQT147	21 – TS Vapor Combustor			1	1	2		1										1		
EQT149	24 – Oleum Barge Loading Scrubber	1																1		
EQT150	26 – Spent Acid Barge Loading Scrubber	1								3			2							
EQT151	27 – Acid Plant Vapor Combustor			1	1	2		2										1		
EQT152	28 – Gasoline Storage Tank							1												
EQT153	6-90 – Package Boiler				1	2														
EQT154	M1a – Unit 2 Cooling Tower				2															
EQT155	M1b – Unit 1 Cooling Tower				2															
EQT285	20D380 – Unit 2 Weak Acid Tank																			
EQT157	30D030 – Oleum Tank																			
EQT158	30D040 – 93/Oleum																			
EQT159	30D050 – 99WW Tank																			
EQT161	30D070 – Spent Acid Tank							2												
EQT163	30D100 – Spent Acid Tank							2												
EQT164	30D110 – Spent Acid Tank							2												
EQT165	30D120 – Spent Acid Tank							2												
EQT166	30D130 – Oleum Tank																			
EQT167	30D140 – 99/Oleum/Spent							2												
EQT168	30D150 – 99/Oleum Spent							2												
EQT169	30D160 – Spent Acid Tank							2												
EQT170	30D180 – 93E Tank																			

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

**Rhodia Inc
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**Rhodia Inc
Baton Rouge, East Baton Rouge Parish, Louisiana**

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements																				
ID No.:	Description	LAC 33:III.Chapter																		
		5[▲]	9	11	13	15	1701	2103	2107	2108	2111	2113	2115	2121	2122	2147	2153	51*	56	59*
EQT171	30D190 – Spent Acid Tank							2												
EQT173	30D210 – 93E Tank																			
EQT174	30D220 – 99WW Tank																			
EQT175	30D230 – 99C Tank																			
EQT176	20D120/30D240 – IFS Mix Tank							1												
EQT177	40D250 – Treatment Services Tank							1												
EQT178	40D280 – Treatment Services Tank							1												
EQT179	40D290 – Treatment Services Tank							1												
EQT180	40D200 – Treatment Services Tank							1												
EQT181	40D210 – Treatment Services Tank							1												
EQT182	40D300 – Treatment Services Tank							1												
EQT183	40D220 – Treatment Services Tank							1												
EQT184	30D103 – Sulfur Unloading Tank																			
EQT185	M7 – 001 Wastewater Treatment Unit																			
EQT186	1-06 – Rental Boiler	1			1	2														
FUG002	FUG-ACID – Acid Plant Fugitive Emissions					2									3			1		
FUG003	FUG-TS – Treatment Services Fugitive Emissions														3			1		
GRP002	SAU – Sulfuric Acid Units 1 & 2	1																		
GRP021	Comb - Combustion (Unit 1, Unit 2, Rental Boiler)	1																		
RLP013	2 – Sulfuric Acid Unit No. 2	1			1	1												1		
RLP014	3 – Sulfuric Acid Unit No. 1	1			1	1												1		
PCS001	Spt-Proc - Spent Acid Process																	1		
PCS002	TS-Proc - TS Process																	1		
EQT277	13 – Acid Plant Caustic Scrubber	1	1			1														
EQT278	U1-Scbr – Unit 1 Tail Gas Scrubber		1																	
EQT279	U2-Scbr – Unit 2 Tail Gas Scrubber		1																	
EQT280	U1-Furn – Unit 1 Furnace			1				2										1		
EQT281	U2-RFurn – Unit 2 Regen Furnace			1				1												

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.Chapter																		
		5 [▲]	9	11	13	15	1701	2103	2107	2108	2111	2113	2115	2121	2122	2147	2153	51*	56	59*
EQT282	U2-SFurn – Unit 2 Sulfur Furnace			1																
EQT283	U1-Proc – Unit 1 Process					1														
EQT284	U2-Proc – Unit 2 Process					1												1		
EQT291	M10 – Diesel Fire-water Pump			1	1															

* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
 -The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
 - 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
 - 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
- Blank – The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

**Rhodia Inc
Agency Interest No.: 1314**

**Rhodia Inc
Baton Rouge, East Baton Rouge Parish, Louisiana**

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60							40 CFR 61					40 CFR 63										40 CFR 65			40 CFR 68			40 CFR 264
		A	Cd	Db	H	K	Ka	Kb	A	J	M	V	FF	A	DD	EEE	F	G*	GGG*	Q	XX*	ZZZZ	A	C	G	64	68	82	BB	
UNF002	Facility Wide	1							1		1		1	1	3			1	1		1						1	1		
ARE002	M4 – West End Sump																	1	1								1	1		
ARE003	M3 - Treatment Services Sumps																													
EQT008	30D260 – Spent Acid Tank							1																1	1					
EQT140	10 – Preheater; Acid Unit No. 1																													
EQT141	11 – Lime Silos																													
EQT142	12 – Oleum Loading Vent Scrubber																													
EQT146	20 – Sulfur Feed Tank																													
EQT147	21 – TS Vapor Combustor							1				1						1												
EQT149	24 – Oleum Barge Loading Scrubber																													
EQT150	26 – Spent Acid Barge Loading Scrubber																													
EQT151	27 – Acid Plant Vapor Combustor																							1		1				
EQT152	28 – Gasoline Storage Tank							3																						
EQT153	6-90 – Package Boiler			1																										
EQT154	M1a – Unit 2 Cooling Tower																			3										
EQT155	M1b – Unit 1 Cooling Tower																			3										
EQT285	20D380 – Unit 2 Weak Acid Tank					3	3	3																						
EQT157	30D030 – Oleum Tank					3	3	3																						
EQT158	30D040 – 93/Oleum					3	3	3																						
EQT159	30D050 – 99WW Tank					3	3	3																						
EQT161	30D070 – Spent Acid Tank					3	3	1																1	1					
EQT163	30D100 – Spent Acid Tank					3	3	1																1	1					
EQT164	30D110 – Spent Acid Tank					3	3	1																1	1					
EQT165	30D120 – Spent Acid Tank					3	3	1																1	1					
EQT166	30D130 – Oleum Tank					3	3	3																						
EQT167	30D140 – 99/Oleum/Spent					3	3	1																1	1					
EQT168	30D150 – 99/Oleum Spent					3	3	1																1	1					
EQT169	30D160 – Spent Acid Tank					3	3	1																1	1					
EQT170	30D180 – 93E Tank					3	3	3																						
EQT171	30D190 – Spent Acid Tank					3	3	1																1	1					

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Rhodia Inc
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Rhodia Inc
Baton Rouge, East Baton Rouge Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60						40 CFR 61					40 CFR 63									40 CFR 65			40 CFR				40 CFR 264
		A	Cd	Db	H	K	Ka	Kb	A	J	M	V	FF	A	DD	EEE	F	G*	GGG*	Q	XX*	ZZZZ	A	C	G	64	68	82	BB
EQT173	30D210 - 93E Tank					3	3	3																					
EQT174	30D220 - 99WW Tank					3	3	3																					
EQT175	30D230 - 99C Tank					3	3	3																					
EQT176	20D120/30D240 - IFS Mix Tank							3																					
EQT177	40D250 - Treatment Services Tank					3	3	1					1					1											
EQT178	40D280 - Treatment Services Tank					3	3	1					1					1											
EQT179	40D290 - Treatment Services Tank					3	3	3					1					1											
EQT180	40D200 - Treatment Services Tank					3	3	1					1					1											
EQT181	40D210 - Treatment Services Tank					3	3	3					1					1											
EQT182	40D300 - Treatment Services Tank					3	3	3					1					1											
EQT183	40D220 - Treatment Services Tank					3	3	3					1					1											
EQT184	30D103 - Sulfur Unloading Tank																												
EQT185	M7 - 001 Wastewater Treatment Unit							3																					
EQT186	I-06 - Rental Boiler			1																									
FUG002	FUG-ACID - Acid Plant Fugitive Emissions																								1				
FUG003	FUG-TS - Treatment Services Fugitive Emissions							1		1		1	1					1											1
GRP002	SAU - Sulfuric Acid Units 1 & 2																												
GRP021	Comb - Combustion (Unit 1, Unit 2, Rental Boiler)																												
RLP013	2 - Sulfuric Acid Unit No. 2	1	1		1 [#]												3									1			
RLP014	3 - Sulfuric Acid Unit No. 1	1	1		1 [#]												3									1			
PCS001	Spt-Proc - Spent Acid Process																												
PCS002	TS-Proc - TS Process																												
EQT277	I3 - Acid Plant Caustic Scrubber																												
EQT278	U1-Scbr - Unit 1 Tail Gas Scrubber																												
EQT279	U2-Scbr - Unit 2 Tail Gas Scrubber																												
EQT280	U1-Furn - Unit 1 Furnace												1					1							1				
EQT281	U2-RFurn - Unit 2 Regen Furnace							1					1					1											
EQT282	U2-SFurn - Unit 2 Sulfur Furnace																												

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Rhodia Inc
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Rhodia Inc
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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60							40 CFR 61					40 CFR 63										40 CFR 65			40 CFR 68			40 CFR 264
		A	Cd	Db	H	K	Ka	Kb	A	J	M	V	FF	A	DD	EEE	F	G*	GGG*	Q	XX*	ZZZZ	A	C	G	64	68	82	BB	
EQT283	U1-Proc – Unit 1 Process																													
EQT284	U2-Proc – Unit 2 Process																													
EQT291	M10 – Diesel Fire-water Pump																					1								

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
 -The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
UNF002 Facility Wide	40 CFR 63 Subpart DD – National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations 40 CFR 63.680(a)	DOES NOT APPLY – Facility is a minor source of emissions of HAPs.
EQT140, 146, 147, 151, 153, 186, and FUG002 (10, 20, 21, 27, 6-90, 1-06, and FUG-ACID)	Emission Standards for Sulfur Dioxide LAC 33:III.1503	EXEMPT - units emit less than 250 TPY of sulfur compounds measured as SO ₂ . LAC 33:III.1503.C
EQT150 26 – Spent Acid Barge Loading Scrubber	Control of Emissions of Organic Compounds – Marine Vapor Recovery LAC 33:III. 2108	DOES NOT APPLY – Uncontrolled emissions are less than 100 tpy of VOCs. LAC 33:III.2108.A
	Control of Emissions of Organic Compounds – Waste Gas Disposal LAC 33:III.2115	EXEMPT – Waste gas stream has a combined weight of VOCs equal to or less than 100 pounds in any continuous 24 hour period. LAC 33:III.2115.H.1.c
EQT 151 27 – Acid Plant Vapor Combustor	Control of Emission of Organic Compounds LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.
EQT152 28 – Gasoline Storage Tank	NSPS Subpart Kb – Standards of Performance for Storage Vessels for Petroleum Liquids 40 CFR 60.110b	DOES NOT APPLY – Storage capacity is less than 73 m ³ 40 CFR 60.110b

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**Rhodia Inc
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XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT154 and 155 M1a and M1b Cooling Towers	Emission Standards for Particulate Matter LAC 33:III.1311.C	EXEMPT – LDEQ has granted an exemption from the opacity standards of LAC 33:III.1311.C as the particulate matter emissions are well below the process rate limitation. LAC 33:III.1311.E
	40 CFR 63 Subpart Q – National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers 40 CFR 63.400	DOES NOT APPLY – The Baton Rouge site does not use chromium-based water treatment chemicals. 40 CFR 63.400(a)
EQT008 Spent Sulfuric Acid Storage Tank	Control of Emission of Organic Compounds LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.
EQTs 161, 163-165, 167-169, 171 Spent Acid Tanks	40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 40 CFR 60.110	DOES NOT APPLY – These tanks do not store petroleum liquids.
	40 CFR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984 40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.
	Control of Emission of Organic Compounds LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.

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**Rhodia Inc
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XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Requirement	Notes	
EQT176 20D120/30D340 – IFS Mix Tank	40 CFR 60 Subpart Kb – Standards of Performance for Storage Volatile Organic Liquid Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 40 CFR 60.110(b)	DOES NOT APPLY – This tank is greater than 75 m ³ and less than 151 m ³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa. 40 CFR 60.110b(b)	
CRG001 (EQTs 177, 178, 180) Tanks	40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 40 CFR 60.110	DOES NOT APPLY – These tanks do not store petroleum liquids.	
	40 CFR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984 40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.	
	LAC 33:III.2103.B – Storage of Volatile Organic Compounds	EXEMPT – Tanks at the Baton Rouge Rhodia, Inc. facility used for the storage of corrosive materials are not required to meet the submerged fill pipe provisions of subsections A and B of LAC 33:III.2103 per LAC 33:III.2103.G.7.	
EQTs 179, 181-183 Tanks	40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 40 CFR 60.110	DOES NOT APPLY – These tanks do not store petroleum liquids.	

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**Rhodia Inc
Baton Rouge, East Baton Rouge Parish, Louisiana**

XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:		Requirement	Notes
EQTs 179, 181-183 Tanks (cont'd)		40 CFR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984 40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.
		40 CFR 60 Subpart Kb – Standards of Performance for Storage Volatile Organic Liquid Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 40 CFR 60.110(b)	DOES NOT APPLY – These vessels have a capacity less than 75 m ³ . 40 CFR 60.110(b)(a)
EQT157 – 159, 162, 166, 170, 173 -175, 285 Tanks		40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 40 CFR 60.110	DOES NOT APPLY – These tanks do not store petroleum liquids.
		40 CFR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984 40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.
		40 CFR 60 Subpart Kb – Standards of Performance for Storage Volatile Organic Liquid Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 40 CFR 60.110(b)	DOES NOT APPLY – These tanks do not store VOLs.

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XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
EQT280 Unit 1 Furnace	Control of Emission of Organic Compounds LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.
FUG002 FUG-ACID	Fugitive Emission Control for Ozone Nonattainment Areas LAC 33:III.2122	DOES NOT APPLY – This facility does not meet the applicability criteria of LAC 33:III.2122.A.1. It is not a SOCM facility per LAC 33:III.Chapter 21.Appendix A.
	Emission Control and Reduction Requirements and Standards LAC 33:III.5109.A	DOES NOT APPLY – This source does not emit any class I or class II TAPs for which site-wide permitted emissions are over the MER. LAC 33:III.5109.A
FUG003 FUG-TS	Fugitive Emission Control for Ozone Nonattainment Areas LAC 33:III.2122	DOES NOT APPLY – This facility does not meet the applicability criteria of LAC 33:III.2122.A.1. It is not a SOCM facility per LAC 33:III.Chapter 21.Appendix A.
RLP013 Sulfuric Acid Unit 2	40 CFR 63 Subpart G – National Emission Standards for Organic Hazardous Air Pollutants From the SOCM for Process Vents, Storage Vessels, Transfer Operations, and Wastewater 40 CFR 63.138(h)(2)(i)	EXEMPT – Per 40 CFR 63.138(h), this unit is exempt from the design evaluation or performance test requirements of 40 CFR 63.138(a)(3) and 40 CFR 63.138(j), and from the monitoring requirements of 40 CFR 63.132(a)(2)(iii), and from the associated recordkeeping and reporting requirements. 40 CFR 63.138(h)
	40 CFR 63 Subpart EEE – National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors 40 CFR 63.1200	DOES NOT APPLY – Facility is not subject to this subpart because the Unit 1 and 2 furnaces are not hazardous waste combustors as defined in the subpart. The Unit 1 and 2 furnaces are BIF facilities, not incinerators.
	Emission Standards for Sulfur Dioxide LAC 33:III Chapter 15	EXEMPT – Rhodia complies with LAC 33:III.Chapter 15 by complying with the more stringent requirements set forth in the Consent Decree and 40 CFR 60 Subpart H.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

**Rhodia Inc
Agency Interest No.: 1314**

**Rhodia Inc
Baton Rouge, East Baton Rouge Parish, Louisiana**

XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:		Requirement	Notes
RLP014 Sulfuric Acid Unit 1		40 CFR 63 Subpart G – National Emission Standards for Organic Hazardous Air Pollutants From the SOCM for Process Vents, Storage Vessels, Transfer Operations, and Wastewater 40 CFR 63.138(h)(2)(i)	EXEMPT – Per 40 CFR 63.138(h), this unit is exempt from the design evaluation or performance test requirements of 40 CFR 63.138(a)(3) and 40 CFR 63.138(j), and from the monitoring requirements of 40 CFR 63.132(a)(2)(iii), and from the associated recordkeeping and reporting requirements. 40 CFR 63.138(h)
		40 CFR 63 Subpart EEE – National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors 40 CFR 63.1200	DOES NOT APPLY – Facility is not subject to this subpart because the Unit 1 and 2 furnaces are not hazardous waste combustors as defined in the subpart. The Unit 1 and 2 furnaces are BIF facilities, not incinerators.
		Emission Standards for Sulfur Dioxide LAC 33:III Chapter 15	EXEMPT starting on May 1, 2012 – Rhodia complies with LAC 33:III.Chapter 15 by complying with the more stringent requirements set forth in the Consent Decree and 40 CFR 60 Subpart H.

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Rhodia Inc
Agency Interest No.: 1314
Rhodia Inc
Baton Rouge, East Baton Rouge Parish, Louisiana

Permittee shall comply with a streamlined equipment leaks monitoring program. Compliance with the streamlined program in accordance with this specific condition shall serve to comply with each of the applicable fugitive emission monitoring programs being streamlined, as indicated in the following table. Noncompliance with the streamlined program in accordance with this specific condition may subject the permittee to enforcement action for one or more of the applicable fugitive emissions programs.

- a. Permittee shall apply the streamlined program to the combined universe of components subject to any of the programs being streamlined. Any component type which does not require periodic monitoring under the overall most stringent program (LA MACT Determination for non-HON Facility Equipment Leaks) shall be monitored as required by the most stringent requirements of any other program being streamlined and will not be exempted. The streamlined program will include any exemptions based on size of component available in any of the programs being streamlined.
- b. Permittee shall use leak definitions and monitoring frequency based on the overall most stringent program. Percent leaker performance shall be calculated using the provisions of the overall most stringent program. Annual monitoring shall be defined as once every four quarters. Some allowance may be made in the first year of the streamlined program in order to allow for transition from existing monitoring schedules.
- c. Permittee shall comply with recordkeeping and reporting requirements of the overall most stringent program. Semiannual reports shall be submitted on September 30 and March 31, to cover the periods January 1 through June 30 and July 1 through December 31, respectively. The semiannual reports shall include any monitoring performed within the reporting period.

Unit or Plant Site	Programs Being Streamlined	Stream Applicability	Overall Most Stringent Program
Sulfuric Acid Plant	LAC 33:III.Chapter 51, LA MACT Determination for non-HON Equipment Leaks	≥ 5% VOTAP	LA MACT Determination for non-HON Equipment Leaks
	40 CFR 61 Subpart V, National Emission Standards for Equipment Leaks (Fugitive Emission Sources)	≥ 5% VOHAP	
	40 CFR 264 Subpart BB, RCRA Subpart BB	≥ 10% Organic	

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Also Known As:

ID	Name	User Group	Start Date
2203300033	AFS (EPA Air Facility System)	AFS (EPA Air Facility System)	01-01-2000
0840-00033	CDS Number	CDS Number	08-05-2002
8215111	EPA EIS Facility Site ID	EPA EIS Facility Site ID	01-01-2008
LAD008161234	Rhodia Inc	Hazardous Waste Notification	11-17-1980
PMT/PC	GPRA Baselines	Hazardous Waste Permitting	10-01-1997
00861	Rhone Poulenc Basic Chemical Co	Inactive & Abandoned Sites	11-23-1999
LAD008161234	Stauffer Chemical Co Baton Rouge	Inactive & Abandoned Sites	11-23-1999
LA0005223	LPDES #	LPDES Permit #	05-22-2003
	Priority 1 Emergency Site	Priority 1 Emergency Site	07-18-2006
GL-349	Radiation General License	Radiation License Number	12-14-2000
LA-338A-N01	Radioactive Material License	Radiation License Number	12-14-2000
1000021558	Rhodia, Inc., Baton Rouge Facility	Risk Management Plan EPA ID	01-01-2001
G-033-3198	Site ID #	Solid Waste Facility No.	11-21-1999
22318	Rhone Poulenc Basic Chemical Co Baton Rouge	TEMPO Merge	01-07-2002
38329	Stauffer Chemical	TEMPO Merge	11-19-2001
38427	Rhodia Inc	TEMPO Merge	01-11-2001
70821STFFRAIRLI	TRI #	Toxic Release Inventory	07-19-2004
WQC 120601-01	Water Quality Certification #	Water Certification	06-04-2012

Physical Location:

1275 Airline Hwy
Baton Rouge, LA 70805

Main FAX: 2253593722
Main Phone: 2253593481

Mailing Address:

1275 Airline Hwy
Baton Rouge, LA 70805

Location of Front Gate:

30.508417 latitude, -91.187938 longitude, Coordinate Method: Lat./Long - Decimal Degrees, Coordinate Datum: NAD83

Related People:

Name	Mailing Address	Phone (Type)	Relationship
S. B. "Bala" Balachandran	1275 Airline Hwy Baton Rouge, LA 70805	2253593443 (WF)	Accident Prevention Contact for
S. B. "Bala" Balachandran	1275 Airline Hwy Baton Rouge, LA 70805	2253593742 (WP)	Accident Prevention Contact for
Tricia DeLatin	1275 Airline Hwy Baton Rouge, LA 70821	2253593410 (WP)	Radiation Contact For
Tricia DeLatin	1275 Airline Hwy Baton Rouge, LA 70821	2253593410 (WP)	Radiation License Billing Party for
Tricia DeLatin	1275 Airline Hwy Baton Rouge, LA 70821	2253593410 (WP)	Water Billing Party for
Tricia DeLatin	1275 Airline Hwy Baton Rouge, LA 70821	2253593410 (WP)	Haz. Waste Billing Party for
John Richardson	1275 Airline Hwy Baton Rouge, LA 70805	JOHN.RICHARDSON	Air Permit Contact For
John Richardson	1275 Airline Hwy Baton Rouge, LA 70805	2253593768 (WP)	Air Permit Contact For

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Related People:	Name	Mailing Address	Phone (Type)	Relationship
	John Richardson	1275 Airline Hwy Baton Rouge, LA 70805	JOHN.RICHARDSOI	Accident Prevention Billing Party for
	John Richardson	1275 Airline Hwy Baton Rouge, LA 70805	2253593768 (WP)	Accident Prevention Billing Party for
	John Richardson	1275 Airline Hwy Baton Rouge, LA 70805	JOHN.RICHARDSOI	Emission Inventory Facility Contact for
	John Richardson	1275 Airline Hwy Baton Rouge, LA 70805	2253593768 (WP)	Emission Inventory Facility Contact for
	Daniel Tate	1275 Airline Hwy Baton Rouge, LA 70805		Responsible Official for
	Daniel Tate	1275 Airline Hwy Baton Rouge, LA 70805	2253567111 (WP)	Responsible Official for

Related Organizations:	Name	Address	Phone (Type)	Relationship
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Air Billing Party for
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Operates
	Rhodia Inc	c/o CT Corporation System Baton Rouge, LA 70808		Agent of Service for
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Emission Inventory Billing Party
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Owns

NAIC Codes: 325188, All Other Basic Inorganic Chemical Manufacturing

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 1314 - Rhodia Inc

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Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Spent Acid Process						
ARE 0002	M4 - West End Sump			55 gallons/mo	55 gallons/mo oil skimmed from sump	8760 hr/yr
EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank	950000 gallons				8760 hr/yr
EQT 0150	26 - Spent Acid Barge Loading Scrubber		800 gallons/min	28.4 MM gallons/yr		1664 hr/yr
EQT 0151	27 - Acid Plant Vapor Combustor		11.5 MM BTU/hr	11.5 MM BTU/hr	Includes Natural Gas and Waste Vent Gas	8760 hr/yr
EQT 0161	30D070 - Spent Acid Tank	125655 gallons				8760 hr/yr
EQT 0163	30D100 - Spent Acid Tank	227869 gallons				8760 hr/yr
EQT 0164	30D110 - Spent Acid Tank	227869 gallons				8760 hr/yr
EQT 0165	30D120 - Spent Acid Tank	227869 gallons				8760 hr/yr
EQT 0167	30D140 - 99/Oleum/Spent	331612 gallons				8760 hr/yr
EQT 0168	30D150 - 99/Oleum/Spent	285198 gallons				8760 hr/yr
EQT 0169	30D160 - Spent Acid Tank	285900 gallons				8760 hr/yr
EQT 0171	30D190 - Spent Acid Tank	285318 gallons				8760 hr/yr
EQT 0176	20D120/30D240 - IFS Mix Tank	25000 gallons				8760 hr/yr
EQT 0185	M7 - 001 Wastewater Treatment Unit			330000 gallons/day		8760 hr/yr
EQT 0277	13 - Acid Plant Caustic Scrubber			315 gallons/min	The control device is a scrubber (99% eff. SO ₂). Works in series with EIQ 151.	2190 hr/yr
FUG 0002	FUG-ACID - Acid Plant Fugitive Emissions					8760 hr/yr

INVENTORIES

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Activity Number: PER20120011

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Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
TS Process						
ARE 0003	M3 - Treatment Services Sumps			2500 gallons/day		8760 hr/yr
EQT 0147	21 - TS Vapor Combustor		11.6 MM BTU/hr	11.6 MM BTU/hr	Includes Natural Gas and Waste Vent Gas	8760 hr/yr
EQT 0177	40D250 - Treatment Services Tank	157000 gallons				8760 hr/yr
EQT 0178	40D280 - Treatment Services Tank	47000 gallons				8760 hr/yr
EQT 0179	40D290 - Treatment Services Tank	12000 gallons				8760 hr/yr
EQT 0180	40D200 - Treatment Services Tank	47000 gallons				8760 hr/yr
EQT 0181	40D210 - Treatment Services Tank	12000 gallons				8760 hr/yr
EQT 0182	40D300 - Treatment Services Tank	8000 gallons				8760 hr/yr
EQT 0183	40D220 - Treatment Services Tank	8000 gallons				8760 hr/yr
EQT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber			900 tons/day		8760 hr/yr
EQT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber			1900 tons/day		8760 hr/yr
EQT 0280	U1-Furn - Unit 1 Furnace			900 tons/day		8760 hr/yr
EQT 0281	U2-RFurn - Unit 2 Regen Furnace			1200 tons/day		8760 hr/yr
EQT 0282	U2-SFurn - Unit 2 Sulfur Furnace			700 tons/day		8760 hr/yr
EQT 0283	U1-Proc - Unit 1 Process			900 tons/day		8760 hr/yr
EQT 0284	U2-Proc - Unit 2 Process			1900 tons/day		8760 hr/yr
FUG 0003	FUG-TS - Treatment Services Fugitive Emissions					8760 hr/yr
RLP 0013	2 - Sulfuric Acid Unit No. 2		2280 tons/day	1900 tons/day		8760 hr/yr
RLP 0014	3 - Sulfuric Acid Unit No. 1		1080 tons/day	900 tons/day		8760 hr/yr

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Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Facility Wide						
EQT 0140	10 - Preheater; Acid Unit No. 1		6 MM BTU/hr	6 MM BTU/hr	This stack is equipped with a rain cap. A negligible velocity is used in modeling analyses.	8760 hr/yr
EQT 0141	11 - Lime Silos		22.5 tons/hr	135 Tons lime/year		6 hr/yr
EQT 0142	12 - Oleum Loading Vent Scrubber		150 gallons/min	2.664 MM gallons/yr		672 hr/yr
EQT 0146	20 - Sulfur Feed Tank	84460 gallons	670 tons/day	670 tons/day	This stack is equipped with a rain cap. A negligible velocity is used in modeling analyses.	8760 hr/yr
EQT 0149	24 - Oleum Barge Loading Scrubber		600 gallons/min	12.96 MM gallons/yr		400 hr/yr
EQT 0152	28 - Gasoline Storage Tank	1000 gallons	10000 gallons/yr	10000 gallons/yr		8760 hr/yr
EQT 0153	6-90 - Package Boiler		106 MM BTU/hr	50 MM BTU/hr	Natural Gas	8760 hr/yr
EQT 0154	M1a - Unit 2 Cooling Tower			36000 gallons/min		8760 hr/yr
EQT 0155	M1b - Unit 1 Cooling Tower			16000 gallons/min		8760 hr/yr
EQT 0157	30D030 - Oleum Tank	158605 gallons				8760 hr/yr
EQT 0158	30D040 - 93/Oleum	158605 gallons				8760 hr/yr
EQT 0159	30D050 - 99WW Tank	158605 gallons				8760 hr/yr
EQT 0166	30D130 - Oleum Tank	331612 gallons				8760 hr/yr
EQT 0170	30D180 - 93E Tank	285247 gallons				8760 hr/yr
EQT 0173	30D210 - 93E Tank	406414 gallons				8760 hr/yr
EQT 0174	30D220 - 99WW Tank	406356 gallons				8760 hr/yr
EQT 0175	30D230 - 99C Tank	1.65 million gallons				8760 hr/yr
EQT 0184	20D103 - Sulfur Unloading Tank	150 gallons				8760 hr/yr
EQT 0186	1-06 - Rental Boiler		133 MM BTU/hr	133 MM BTU/hr		8760 hr/yr
EQT 0285	20D380 - Unit 2 Weak Acid Tank	21000 gallons				8760 hr/yr
EQT 0291	M10 - Diesel Fire-Water Pump		200 horsepower	200 horsepower		500 hr/yr

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Spent Acid Process							
ARE 0002	M4 - West End Sump						72
EQT 0150	26 - Spent Acid Barge Loading Scrubber	27.81	1000	.87		13	120
EQT 0151	27 - Acid Plant Vapor Combustor	21.7	21500	4.6		35	1520
EQT 0185	M7 - 001 Wastewater Treatment Unit						72
FUG 0002	FUG-ACID - Acid Plant Fugitive Emissions						72
TS Process							
ARE 0003	M3 - Treatment Services Sumps						72

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Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
TS Process							
EQT 0147	21 - TS Vapor Combustor	7.7	13100	6		50	1600
FUG 0003	FUG-TS - Treatment Services Fugitive Emissions						72
RLP 0013	2 - Sulfuric Acid Unit No. 2	113.9	108705	4.5		130	90
RLP 0014	3 - Sulfuric Acid Unit No. 1	118.1	50080	3		130	90
Facility Wide							
EQT 0140	10 - Preheater; Acid Unit No. 1	46	26500	3.5		62	550
EQT 0141	11 - Lime Silos	6.7	250	.89		55	100
EQT 0142	12 - Oleum Loading Vent Scrubber	4.4	51.84	.5		15	100
EQT 0146	20 - Sulfur Feed Tank	13.6	15.4	1.2		30	284
EQT 0149	24 - Oleum Barge Loading Scrubber	38	200	.33		12.5	72
EQT 0152	28 - Gasoline Storage Tank	0	.02	.33		5	72
EQT 0153	6-90 - Package Boiler	25	14000	3.5		60	850
EQT 0154	M1a - Unit 2 Cooling Tower	25.6	945476	28		46	89
EQT 0155	M1b - Unit 1 Cooling Tower	27.9	526811	20		46	89
EQT 0186	1-06 - Rental Boiler	15.4	22000	5.5		20	470
EQT 0291	M10 - Diesel Fire-Water Pump	6.5	76.8	.5		9.25	355

Relationships:

ID	Description	Relationship	ID	Description
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0157	30D030 - Oleum Tank
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0158	30D040 - 93/Oleum
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0166	30D130 - Oleum Tank
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0182	40D300 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0181	40D210 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0180	40D200 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0179	40D290 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0178	40D280 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0177	40D250 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0183	40D220 - Treatment Services Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0161	30D070 - Spent Acid Tank

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Relationships:

ID	Description	Relationship	ID	Description
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0163	30D100 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0164	30D110 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0165	30D120 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0169	30D160 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0171	30D190 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0176	20D120/30D240 - IFS Mix Tank
EQT 0184	20D103 - Sulfur Unloading Tank	Vents to	EQT 0146	20 - Sulfur Feed Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0164	30D110 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0163	30D100 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0161	30D070 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Vents to	EQT 0151	27 - Acid Plant Vapor Combustor
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0165	30D120 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0176	20D120/30D240 - IFS Mix Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0171	30D190 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0169	30D160 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
EQT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber	Vents to	RLP 0014	3 - Sulfuric Acid Unit No. 1
EQT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber	Controls emissions from	EQT 0283	U1-Proc - Unit 1 Process
EQT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber	Controls emissions from	EQT 0284	U2-Proc - Unit 2 Process
EQT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber	Vents to	RLP 0013	2 - Sulfuric Acid Unit No. 2
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0165	30D120 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0164	30D110 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0163	30D100 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0161	30D070 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0169	30D160 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0176	20D120/30D240 - IFS Mix Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0171	30D190 - Spent Acid Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0182	40D300 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0178	40D280 - Treatment Services Tank

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Relationships:

ID	Description	Relationship	ID	Description
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0179	40D290 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0180	40D200 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0177	40D250 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0183	40D220 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0181	40D210 - Treatment Services Tank
EQT 0283	U1-Proc - Unit 1 Process	Controls emissions from	EQT 0280	U1-Furn - Unit 1 Furnace
EQT 0284	U2-Proc - Unit 2 Process	Controls emissions from	EQT 0282	U2-SFurn - Unit 2 Sulfur Furnace
EQT 0284	U2-Proc - Unit 2 Process	Controls emissions from	EQT 0281	U2-RFurn - Unit 2 Regen Furnace

Subject Item Groups:

ID	Group Type	Group Description
CRG 0001	Common Requirements Group	CRG001 - 40D250, 40D280, and 40D200
CRG 0002	Common Requirements Group	CRG002 - 40D290, 40D210, 40D300, and 40D220
CRG 0003	Common Requirements Group	CRG003 - Spent Acid Tanks
CRG 0004	Common Requirements Group	CRG004 - 99/Oleum/Spent Swing Tanks
GRP 0002	Equipment Group	SAU - SULFURIC ACID UNITS 1 & 2
GRP 0021	Equipment Group	Comb - Combustion (Unit 1, Unit 2, Package Boiler, Rental Boiler)
PCS 0001	Process Group	Spt-Proc - Spent Acid Process
PCS 0002	Process Group	TS-Proc - TS Process
UNF 0002	Unit or Facility Wide	UNF02 - Facility Wide

Group Membership:

ID	Description	Member of Groups
ARE 0002	M4 - West End Sump	PCS0000000001
ARE 0003	M3 - Treatment Services Sumps	PCS0000000002
CRG 0001	CRG001 - 40D250, 40D280, and 40D200	PCS0000000002
CRG 0002	CRG002 - 40D290, 40D210, 40D300, and 40D220	PCS0000000002
CRG 0003	CRG003 - Spent Acid Tanks	PCS0000000001
CRG 0004	CRG004 - 99/Oleum/Spent Swing Tanks	PCS0000000001
EQT 0008	30D280 - Spent Sulfuric Acid Storage Tank	CRG0000000003, PCS0000000001
EQT 0147	21 - TS Vapor Combustor	PCS0000000002
EQT 0150	26 - Spent Acid Barge Loading Scrubber	PCS0000000001
EQT 0151	27 - Acid Plant Vapor Combustor	PCS0000000001
EQT 0153	6-90 - Package Boiler	GRP0000000021
EQT 0161	30D070 - Spent Acid Tank	CRG0000000003, PCS0000000001
EQT 0163	30D100 - Spent Acid Tank	CRG0000000003, PCS0000000001
EQT 0164	30D110 - Spent Acid Tank	CRG0000000003, PCS0000000001
EQT 0165	30D120 - Spent Acid Tank	CRG0000000003, PCS0000000001

INVENTORIES

AI ID: 1314 - Rhodia Inc
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Group Membership:

ID	Description	Member of Groups
EQT 0167	30D140 - 99/Oleum/Spent	CRG0000000004, PCS0000000001
EQT 0168	30D150 - 99/Oleum/Spent	CRG0000000004, PCS0000000001
EQT 0169	30D160 - Spent Acid Tank	CRG0000000003, PCS0000000001
EQT 0171	30D190 - Spent Acid Tank	CRG0000000003, PCS0000000001
EQT 0176	20D120/30D240 - IFS Mix Tank	PCS0000000001
EQT 0177	40D250 - Treatment Services Tank	CRG0000000001, PCS0000000002
EQT 0178	40D280 - Treatment Services Tank	CRG0000000001, PCS0000000002
EQT 0179	40D290 - Treatment Services Tank	CRG0000000002, PCS0000000002
EQT 0180	40D200 - Treatment Services Tank	CRG0000000001, PCS0000000002
EQT 0181	40D210 - Treatment Services Tank	CRG0000000002, PCS0000000002
EQT 0182	40D300 - Treatment Services Tank	CRG0000000002, PCS0000000002
EQT 0183	40D220 - Treatment Services Tank	CRG0000000002, PCS0000000002
EQT 0185	M7 - 001 Wastewater Treatment Unit	PCS0000000001
EQT 0186	1-06 - Rental Boiler	GRP0000000021
EQT 0277	13 - Acid Plant Caustic Scrubber	PCS0000000001
EQT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber	PCS0000000002
EQT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber	PCS0000000002
EQT 0280	U1-Furn - Unit 1 Furnace	PCS0000000002
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	PCS0000000002
EQT 0282	U2-SFurn - Unit 2 Sulfur Furnace	PCS0000000002
EQT 0283	U1-Proc - Unit 1 Process	PCS0000000002
EQT 0284	U2-Proc - Unit 2 Process	PCS0000000002
FUG 0002	FUG-ACID - Acid Plant Fugitive Emissions	PCS0000000001
FUG 0003	FUG-TS - Treatment Services Fugitive Emissions	PCS0000000002
RLP 0013	2 - Sulfuric Acid Unit No. 2	GRP0000000002, GRP0000000021, PCS0000000002
RLP 0014	3 - Sulfuric Acid Unit No. 1	GRP0000000002, GRP0000000021, PCS0000000002

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0540	0540 Sulphuric Acid Manufacture (Rated Capacity)	2800	tons/day

SIC Codes:

2819	Industrial inorganic chemicals, nec	AI 1314
2819	Industrial inorganic chemicals, nec	UNF 002

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO2e

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Subject Item	CO			NOx			PM10			SO2		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Spent Acid Process												
ARE 0002 M4												
EQT 0150 26										0.002	0.03	<0.01
EQT 0151 27	1.69	15.13	7.40	0.29	6.89	1.29	0.02	0.06	0.07	0.01	0.40	0.04
EQT 0185 M7												
FUG 0002 FUG-ACID							0.10		0.46	0.31		1.38
TS Process												
ARE 0003 M3												
EQT 0147 21	0.92	6.40	4.04	0.88	6.99	3.85	0.08	0.08	0.37	0.06	0.28	0.25
FUG 0003 FUG-TS												
RLP 0013 2		74.61			134.56			23.75				
RLP 0014 3		44.26			63.27			11.25			904.17	
Facility Wide												
EQT 0140 10	0.47	0.47	2.06	0.56	0.56	2.45	0.04	0.04	0.19	0.003	0.003	0.01
EQT 0141 11							2.48		0.01			
EQT 0142 12							0.01	0.09	<0.01			
EQT 0146 20										0.01	0.11	0.04
EQT 0149 24							0.004	0.01	<0.01			
EQT 0152 28												
EQT 0153 6-90		18.76			21.20			1.27			0.58	
EQT 0154 M1a							0.63		2.76			
EQT 0155 M1b							0.28		1.23			
EQT 0186 1-06		3.59			5.05			0.99			0.08	
EQT 0291 M10	1.34		0.33	6.20		1.55	0.44		0.11	0.41		0.10

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO2e

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120011
Permit Number: 0840-00033-V5
Air - Title V Regular Permit Minor Mod

Subject Item	VOC			Lead		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Spent Acid Process						
ARE 0002 M4	0.03		0.14			
EQT 0150 26	1.12	51.40	0.93			
EQT 0151 27	0.45	7.64	1.95			
EQT 0185 M7	0.44		1.91			
FUG 0002 FUG-ACID	0.15		0.65			
TS Process						
ARE 0003 M3	0.02		0.07			
EQT 0147 21	0.21	0.28	0.92			
FUG 0003 FUG-TS	0.67		2.94			
RLP 0013 2		2.73			0.12	
RLP 0014 3		0.94			0.08	
Facility Wide						
EQT 0140 10	0.03	0.03	0.13			
EQT 0141 11						
EQT 0142 12						
EQT 0146 20	0.07	0.45	0.29			
EQT 0149 24						
EQT 0152 28	0.07		0.29			
EQT 0153 6-90		2.97				
EQT 0154 M1a						
EQT 0155 M1b						
EQT 0186 1-06		0.72				
EQT 0291 M10	0.50		0.13			

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO2e

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Subject Item	CO			NOx			PM10			SO2		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Facility Wide												
GRP 0002 SAU												
GRP 0021 Comb	20.54		89.98	25.00		109.50	12.27		53.73	245.69		1076.13

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO2e

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Subject Item	VOC			Lead		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Facility Wide						
GRP 0002 SAU				0.02		0.08
GRP 0021 Comb	4.46		19.52			

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120011
Permit Number: 0840-00033-V5
Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0142 12	Sulfuric acid	0.01	0.09	<0.01
EQT 0146 20	Carbon disulfide	0.07	0.45	0.29
	Carbonyl sulfide	<0.001	0.001	<0.01
	Hydrogen sulfide	0.49	2.23	2.16
EQT 0147 21	Chlorine	0.004	0.03	0.02
	Hydrochloric acid	0.08	0.52	0.36
EQT 0149 24	Sulfuric acid	0.004	0.01	<0.01
EQT 0151 27	Chlorine	0.005	0.11	0.02
	Hydrochloric acid	0.09	2.24	0.39
EQT 0152 28	2,2,4-Trimethylpentane	0.001		<0.01
	Benzene	0.001		<0.01
	Ethyl benzene	<0.001		<0.01
	Toluene	0.001		<0.01
	Xylene (mixed isomers)	<0.001		<0.01
	n-Hexane	0.001		<0.01
FUG 0002 FUG-ACID	Sulfuric acid	0.10		0.46
GRP 0002 SAU	Antimony (and compounds)	0.007		0.032
	Arsenic (and compounds)	0.005		0.022
	Barium (and compounds)	0.041		0.181
	Beryllium (Table 51.1)	0.003		0.012
	Cadmium (and compounds)	0.003		0.012
	Chlorine	0.39		1.70
	Chromium VI (and compounds)	0.007		0.030
	Cobalt compounds	0.01		0.03
	Copper (and compounds)	0.025		0.111
	Hydrochloric acid	0.82		3.59
	Manganese (and compounds)	0.02		0.08
	Mercury (and compounds)	0.003		0.012
	Nickel (and compounds)	0.009		0.038
PCS 0001 Spt-Proc	Selenium (and compounds)	0.013		0.056
	Sulfuric acid	9.57		41.90
	Zinc (and compounds)	0.05		0.22
	1,1,1-Trichloroethane	0.11		0.50

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
 Activity Number: PER20120011
 Permit Number: 0840-00033-V5
 Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	1,1,2,2-Tetrachloroethane	0.005		0.02
	1,1,2-Trichloroethane	0.05		0.20
	1,1-Dichloroethane	0.11		0.50
	1,1-Dimethylhydrazine	0.11		0.50
	1,2,4-Trichlorobenzene	0.11		0.50
	1,2-Dibromo-3-chloropropane	0.11		0.50
	1,2-Dibromoethane	<0.001		0.001
	1,2-Dichloroethane	0.001		0.002
	1,2-Dichloropropane	0.11		0.50
	1,2-Diphenylhydrazine	0.11		0.50
	1,2-Epoxybutane	0.11		0.50
	1,2-Epoxyethylbenzene	0.11		0.50
	1,2-Oxathiolane 2,2-dioxide	0.11		0.50
	1,3-Butadiene	<0.001		0.001
	1,3-Dichloropropene	0.005		0.02
	1,4-Dichlorobenzene	0.11		0.50
	1,4-Dioxane	0.01		0.05
	2,2'-dichlorodiethylether	0.03		0.11
	2,2,4-Trimethylpentane	0.11		0.50
	2,4,5-Trichlorophenol	0.11		0.50
	2,4,6-Trichlorophenol	0.11		0.50
	2,4-Dichlorophenoxyacetic Acid	0.11		0.50
	2,4-Dinitrophenol	0.11		0.50
	2,4-Dinitrotoluene	0.002		0.01
	2,4-Toluene diamine	0.11		0.50
	2,6-Dinitrotoluene	0.002		0.01
	2-Acetylamino fluorene	0.11		0.50
	2-nitro-Propane	0.03		0.14
	3,3'-Dichlorobenzidine	0.11		0.50
	4,4'-Methylenebis-(2-Chloroaniline)	0.11		0.50
	4,4'-Methylenebisbenzeneamine	0.11		0.50
	4,6 Dinitro-o-cresol	0.11		0.50
	4-Aminodiphenyl	0.11		0.50

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120011
Permit Number: 0840-00033-V5
Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spl-Proc	4-Dimethylaminoazobenzene	0.11		0.50
	4-Nitrobiphenyl	0.11		0.50
	4-Nitrophenol	0.11		0.50
	Acetaldehyde	0.01		0.04
	Acetamide	0.11		0.50
	Acetonitrile	0.06		0.25
	Acetophenone	0.11		0.50
	Acrolein	<0.001		0.001
	Acrylamide	<0.001		0.001
	Acrylic acid	0.005		0.02
	Acrylonitrile	<0.001		0.002
	Allyl chloride	<0.001		0.001
	Amiben	0.11		0.50
	Ammonia	0.01		0.06
	Aniline	0.01		0.03
	Benzene	0.002		0.01
	Benzidine	0.11		0.50
	Benzotrichloride	0.11		0.50
	Benzyl chloride	0.11		0.50
	Biphenyl	0.002		0.01
	Bromoform	0.11		0.50
	Calcium cyanamide	0.11		0.50
	Captan	0.11		0.50
	Carbaryl	0.11		0.50
	Carbon disulfide	0.03		0.12
	Carbon tetrachloride	0.002		0.01
	Carbonyl sulfide	0.01		0.05
	Chlordane	0.11		0.50
	Chlorine dioxide	<0.001		0.001
	Chloroacetic acid	0.11		0.50
	Chlorobenzene	<0.001		0.001
	Chloroethane	0.11		0.50
	Chloroform	0.002		0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120011
Permit Number: 0840-00033-V5
Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	Chloromethyl methyl ether	0.11		0.50
	Chloroprene	0.03		0.14
	Cresol	0.02		0.08
	Cumene	0.11		0.50
	Cyanide compounds	0.11		0.50
	Diaminotoluene (mixed isomers)	0.002		0.01
	Diazomethane	0.11		0.50
	Dibutyl phthalate	0.005		0.02
	Dichloromethane	0.01		0.03
	Dichlorvos	0.11		0.50
	Diethanolamine	0.11		0.50
	Diethyl Sulfate	0.11		0.50
	Dimethyl formamide	0.11		0.50
	Dimethyl phthalate	0.11		0.50
	Dimethyl sulfate	0.11		0.50
	Dimethylcarbamoyl chloride	0.11		0.50
	Epichlorohydrin	0.04		0.17
	Ethyl 4,4'-Dichlorobenzilate	0.11		0.50
	Ethyl Acrylate	0.02		0.08
	Ethyl benzene	0.11		0.50
	Ethylene glycol	0.10		0.45
	Ethylene oxide	<0.001		0.002
	Ethyleneimine	0.11		0.50
	Ethylenethiourea	0.11		0.50
	Formaldehyde	0.002		0.01
	Glycol ethers (Table 51.1)	0.01		0.06
	Glycol ethers (Table 51.3)	0.11		0.50
	Heptachlor	0.11		0.50
	Hexachlorobenzene	0.01		0.04
	Hexachlorobutadiene	<0.001		0.001
	Hexachlorocyclopentadiene	0.11		0.50
	Hexachloroethane	0.01		0.04
	Hexamethylene diisocyanate	0.11		0.50

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120011
Permit Number: 0840-00033-V5
Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	Hexamethylphosphoramide	0.11		0.50
	Hydrazine	<0.001		0.001
	Hydrofluoric acid	0.002		0.01
	Hydrogen cyanide	0.01		0.04
	Hydrogen sulfide	0.002		0.01
	Hydroquinone	0.11		0.50
	Iodomethane	0.11		0.50
	Isophorone	0.11		0.50
	Lindane	0.11		0.50
	Maleic anhydride	0.002		0.01
	Methanol	0.11		0.50
	Methoxychlor	0.11		0.50
	Methyl Isocyanate	0.11		0.50
	Methyl Tertiary Butyl Ether	0.11		0.50
	Methyl bromide	0.11		0.50
	Methyl chloride	0.09		0.39
	Methyl ethyl ketone	0.11		0.50
	Methyl isobutyl ketone	0.002		0.01
	Methyl methacrylate	0.11		0.50
	Methylene diphenyl diisocyanate	0.11		0.50
	Monomethyl hydrazine	0.11		0.50
	N,N-Diethyl aniline	0.11		0.50
	N,N-dimethylbenzenamine	0.11		0.50
	N-Nitroso-N-Methylurea	0.11		0.50
	N-Nitrosodimethylamine	0.11		0.50
	N-Nitrosomorpholine	0.11		0.50
	Naphthalene (and Methyl naphthalenes)	0.02		0.10
	Nitric acid	0.005		0.02
	Nitrobenzene	0.005		0.02
	Parathion	0.11		0.50
	Pentachloronitrobenzene	0.11		0.50
	Phenol	0.005		0.02
	Phosgene	<0.001		0.002

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120011
Permit Number: 0840-00033-V5
Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	Phosphine	0.11		0.50
	Phosphorus, Total (as P)	0.11		0.50
	Phthalic Anhydride	0.005		0.02
	Polychlorinated biphenyls	0.11		0.50
	Polynuclear Aromatic Hydrocarbons	<0.001		0.001
	Propionaldehyde	0.01		0.04
	Propoxur	0.11		0.50
	Propylene oxide	0.01		0.04
	Propylenimine	0.11		0.50
	Pyridine	0.01		0.06
	Pyrocatechol	0.11		0.50
	Quinoline	0.11		0.50
	Quinone	0.11		0.50
	Styrene	0.02		0.10
	Tetrachloroethylene	0.03		0.14
	Titanium tetrachloride	0.11		0.50
	Toluene	0.11		0.50
	Toluene-2,4-diisocyanate	<0.001		0.001
	Toluene-2,6-Diisocyanate	<0.001		0.001
	Toxaphene	0.11		0.50
	Trichloroethylene	0.01		0.05
	Triethyl amine	0.11		0.50
	Trifluralin	0.11		0.50
	Urethane	0.11		0.50
	Vinyl acetate	0.03		0.13
	Vinyl bromide	0.11		0.50
	Vinyl chloride	0.002		0.01
	Vinylidene chloride	0.02		0.08
	Xylene (mixed isomers)	0.11		0.50
	alpha-Chloroacetophenone	0.11		0.50
	beta-Propiolactone	0.11		0.50
	bis(2-ethylhexyl)phthalate	0.11		0.50
	bis(Chloromethyl)ether	0.11		0.50

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120011
Permit Number: 0840-00033-V5
Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	n-Hexane	0.11		0.50
	n-butyl alcohol	0.11		0.50
	o-Aminoanisole	0.11		0.50
	o-dianisidine	0.11		0.50
	ortho-Tolidine	0.11		0.50
	ortho-Toluidine	0.11		0.50
	p,p'-DDE	0.11		0.50
	para-Phenylenediamine	0.11		0.50
	pentachloro-Phenol	0.11		0.50
PCS 0002 TS-Proc	1,1,1-Trichloroethane	0.11		0.50
	1,1,2,2-Tetrachloroethane	0.03		0.12
	1,1,2-Trichloroethane	0.11		0.50
	1,1-Dichloroethane	0.11		0.50
	1,1-Dimethylhydrazine	0.11		0.50
	1,2,4-Trichlorobenzene	0.11		0.50
	1,2-Dibromo-3-chloropropane	0.11		0.50
	1,2-Dibromoethane	0.003		0.011
	1,2-Dichloroethane	0.005		0.021
	1,2-Dichloropropane	0.11		0.50
	1,2-Diphenylhydrazine	0.11		0.50
	1,2-Epoxybutane	0.11		0.50
	1,2-Epoxyethylbenzene	0.11		0.50
	1,2-Oxathiolane 2,2-dioxide	0.11		0.50
	1,3-Butadiene	0.003		0.011
	1,3-Dichloropropene	0.03		0.14
	1,4-Dichlorobenzene	0.11		0.50
	1,4-Dioxane	0.10		0.44
	2,2'-dichlorodiethylether	0.11		0.50
	2,2,4-Trimethylpentane	0.11		0.50
	2,4,5-Trichlorophenol	0.11		0.50
	2,4,6-Trichlorophenol	0.11		0.50
	2,4-Dichlorophenoxyacetic Acid	0.11		0.50
	2,4-Dinitrophenol	0.11		0.50

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120011
Permit Number: 0840-00033-V5
Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0002 TS-Proc	2,4-Dinitrotoluene	0.01		0.03
	2,4-Toluene diamine	0.11		0.50
	2,6-Dinitrotoluene	0.01		0.03
	2-Acetylaminofluorene	0.11		0.50
	2-nitro-Propane	0.11		0.50
	3,3'-Dichlorobenzidine	0.11		0.50
	4,4'-Methylenebis-(2-Chloroaniline)	0.11		0.50
	4,4'-Methylenebisbenzeneamine	0.11		0.50
	4,6 Dinitro-o-cresol	0.11		0.50
	4-Aminodiphenyl	0.11		0.50
	4-Dimethylaminoazobenzene	0.11		0.50
	4-Nitrobiphenyl	0.11		0.50
	4-Nitrophenol	0.11		0.50
	Acetaldehyde	0.07		0.30
	Acetamide	0.11		0.50
	Acetonitrile	0.11		0.50
	Acetophenone	0.11		0.50
	Acrolein	0.003		0.011
	Acrylamide	0.003		0.011
	Acrylic acid	0.04		0.17
	Acrylonitrile	0.003		0.015
	Allyl chloride	0.003		0.011
	Amiben	0.11		0.50
	Ammonia	0.11		0.50
	Aniline	0.06		0.26
	Benzene	0.02		0.10
	Benzidine	0.11		0.50
	Benzotrichloride	0.11		0.50
	Benzyl chloride	0.11		0.50
	Biphenyl	0.01		0.03
	Bromoform	0.11		0.50
	Calcium cyanamide	0.11		0.50
	Captan	0.11		0.50

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
 Activity Number: PER20120011
 Permit Number: 0840-00033-V5
 Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0002 TS-Proc	Carbaryl	0.11		0.50
	Carbon disulfide	0.11		0.50
	Carbon tetrachloride	0.01		0.03
	Carbonyl sulfide	0.10		0.43
	Chlordane	0.11		0.50
	Chlorinated Dibenzo-P-Dioxins	1.0E-08		5.0E-08
	Chlorinated dibenzofurans	1.0E-08		5.0E-08
	Chlorine dioxide	0.003		0.011
	Chloroacetic acid	0.11		0.50
	Chlorobenzene	0.003		0.011
	Chloroethane	0.11		0.50
	Chloroform	0.005		0.02
	Chloromethyl methyl ether	0.11		0.50
	Chloroprene	0.11		0.50
	Cresol	0.11		0.50
	Cumene	0.11		0.50
	Cyanide compounds	0.11		0.50
	Diaminotoluene (mixed isomers)	0.03		0.11
	Diazomethane	0.11		0.50
	Dibutyl phthalate	0.04		0.16
	Dichloromethane	0.05		0.23
	Dichlorvos	0.11		0.50
	Diethanolamine	0.11		0.50
	Diethyl Sulfate	0.11		0.50
	Dimethyl formamide	0.11		0.50
	Dimethyl phthalate	0.11		0.50
	Dimethyl sulfate	0.11		0.50
	Dimethylcarbamoyl chloride	0.11		0.50
	Epichlorohydrin	0.11		0.50
	Ethyl 4,4'-Dichlorobenzilate	0.11		0.50
	Ethyl Acrylate	0.11		0.50
	Ethyl benzene	0.11		0.50
	Ethylene glycol	0.11		0.50

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
 Activity Number: PER20120011
 Permit Number: 0840-00033-V5
 Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0002 TS-Proc	Ethylene oxide	0.003		0.015
	Ethyleneimine	0.11		0.50
	Ethylenethiourea	0.11		0.50
	Formaldehyde	0.03		0.11
	Glycol ethers (Table 51.1)	0.11		0.50
	Glycol ethers (Table 51.3)	0.11		0.50
	Heptachlor	0.11		0.50
	Hexachlorobenzene	0.08		0.37
	Hexachlorobutadiene	0.003		0.011
	Hexachlorocyclopentadiene	0.11		0.50
	Hexachloroethane	0.07		0.30
	Hexamethylene diisocyanate	0.11		0.50
	Hexamethylphosphoramide	0.11		0.50
	Hydrazine	0.003		0.011
	Hydrofluoric acid	0.005		0.02
	Hydrogen cyanide	0.08		0.34
	Hydrogen sulfide	0.01		0.04
	Hydroquinone	0.11		0.50
	Iodomethane	0.11		0.50
	Isophorone	0.11		0.50
	Lindane	0.11		0.50
	Maleic anhydride	0.005		0.02
	Methanol	0.11		0.50
	Methoxychlor	0.11		0.50
	Methyl isocyanate	0.11		0.50
	Methyl Tertiary Butyl Ether	0.11		0.50
	Methyl bromide	0.11		0.50
	Methyl chloride	0.11		0.50
	Methyl ethyl ketone	0.11		0.50
	Methyl isobutyl ketone	0.002		0.01
	Methyl methacrylate	0.11		0.50
	Methylene diphenyl diisocyanate	0.11		0.50
	Monomethyl hydrazine	0.11		0.50

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0002 TS-Proc	N,N-Diethyl aniline	0.11		0.50
	N,N-dimethylbenzenamine	0.11		0.50
	N-Nitroso-N-Methylurea	0.11		0.50
	N-Nitrosodimethylamine	0.11		0.50
	N-Nitrosomorpholine	0.11		0.50
	Naphthalene (and Methyl naphthalenes)	0.11		0.50
	Nitric acid	0.03		0.12
	Nitrobenzene	0.04		0.17
	Parathion	0.11		0.50
	Pentachloronitrobenzene	0.11		0.50
	Phenol	0.04		0.16
	Phosgene	0.003		0.012
	Phosphine	0.11		0.50
	Phosphorus, Total (as P)	0.11		0.50
	Phthalic Anhydride	0.04		0.17
	Polychlorinated biphenyls	0.11		0.50
	Polynuclear Aromatic Hydrocarbons	0.003		0.011
	Propionaldehyde	0.07		0.30
	Propoxur	0.11		0.50
	Propylene oxide	0.07		0.30
	Propylenimine	0.11		0.50
	Pyridine	0.11		0.50
	Pyrocatechol	0.11		0.50
	Quinoline	0.11		0.50
	Quinone	0.11		0.50
	Styrene	0.11		0.50
	Tetrachloroethylene	0.11		0.50
	Titanium tetrachloride	0.11		0.50
	Toluene	0.11		0.50
	Toluene-2,4-diisocyanate	0.003		0.011
	Toluene-2,6-Diisocyanate	0.003		0.011
	Toxaphene	0.11		0.50
	Trichloroethylene	0.09		0.38

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
 Activity Number: PER20120011
 Permit Number: 0840-00033-V5
 Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0002 TS-Proc	Triethyl amine	0.11		0.50
	Trifluralin	0.11		0.50
	Urethane	0.11		0.50
	Vinyl acetate	0.11		0.50
	Vinyl bromide	0.11		0.50
	Vinyl chloride	0.02		0.10
	Vinylidene chloride	0.11		0.50
	Xylene (mixed isomers)	0.11		0.50
	alpha-Chloroacetophenone	0.11		0.50
	beta-Propiolactone	0.11		0.50
	bis(2-ethylhexyl)phthalate	0.11		0.50
	bis(Chloromethyl)ether	0.11		0.50
	n-Hexane	0.11		0.50
	n-butyl alcohol	0.11		0.50
	o-Aminoanisole	0.11		0.50
	o-dianisidine	0.11		0.50
	ortho-Tolidine	0.11		0.50
	ortho-Toluidine	0.11		0.50
	p,p'-DDE	0.11		0.50
	para-Phenylenediamine	0.11		0.50
	pentachloro-Phenol	0.11		0.50
RLP 0013 2	Antimony (and compounds)		0.671	
	Arsenic (and compounds)		0.001	
	Barium (and compounds)		1.313	
	Beryllium (Table 51.1)		0.001	
	Cadmium (and compounds)		0.001	
	Chlorine		0.57	
	Chromium VI (and compounds)		0.006	
	Cobalt compounds		0.17	
	Copper (and compounds)		0.632	
	Hydrochloric acid		2.12	
	Manganese (and compounds)		0.43	
	Mercury (and compounds)		0.013	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120011
Permit Number: 0840-00033-V5
Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
RLP 0013 2	Nickel (and compounds)		0.006	
	Selenium (and compounds)		0.413	
	Sulfuric acid		11.88	
	Zinc (and compounds)		1.24	
RLP 0014 3	Antimony (and compounds)		0.466	
	Arsenic (and compounds)		0.004	
	Barium (and compounds)		0.778	
	Beryllium (Table 51.1)		<0.001	
	Cadmium (and compounds)		<0.001	
	Chlorine		0.21	
	Chromium VI (and compounds)		0.001	
	Cobalt compounds		0.10	
	Copper (and compounds)		0.379	
	Hydrochloric acid		14.87	
	Manganese (and compounds)		0.26	
	Mercury (and compounds)		0.011	
	Nickel (and compounds)		0.003	
	Selenium (and compounds)		0.373	
	Sulfuric acid		5.63	
	Zinc (and compounds)		0.75	
UNF 0002 UNF02	1,1,1-Trichloroethane			1.00
	1,1,2,2-Tetrachloroethane			0.14
	1,1,2-Trichloroethane			0.70
	1,1-Dichloroethane			1.00
	1,1-Dimethylhydrazine			1.00
	1,2,4-Trichlorobenzene			1.00
	1,2-Dibromo-3-chloropropane			1.00
	1,2-Dibromoethane			0.012
	1,2-Dichloroethane			0.023
	1,2-Dichloropropane			1.00
	1,2-Diphenylhydrazine			1.00
	1,2-Epoxybutane			1.00
	1,2-Epoxyethylbenzene			1.00

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120011
Permit Number: 0840-00033-V5
Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002 UNF02	1,2-Oxathiolane 2,2-dioxide			1.00
	1,3-Butadiene			0.012
	1,3-Dichloropropene			0.16
	1,4-Dichlorobenzene			1.00
	1,4-Dioxane			0.49
	2,2'-dichlorodiethylether			0.61
	2,2,4-Trimethylpentane			1.01
	2,4,5-Trichlorophenol			1.00
	2,4,6-Trichlorophenol			1.00
	2,4-Dichlorophenoxyacetic Acid			1.00
	2,4-Dinitrophenol			1.00
	2,4-Dinitrotoluene			0.04
	2,4-Toluene diamine			1.00
	2,6-Dinitrotoluene			0.04
	2-Acetylaminofluorene			1.00
	2-nitro-Propane			0.64
	3,3'-Dichlorobenzidine			1.00
	4,4'-Methylenebis-(2-Chloroaniline)			1.00
	4,4'-Methylenebisbenzeneamine			1.00
	4,6 Dinitro-o-cresol			1.00
	4-Aminodiphenyl			1.00
	4-Dimethylaminoazobenzene			1.00
	4-Nitrobiphenyl			1.00
	4-Nitrophenol			1.00
	Acetaldehyde			0.34
	Acetamide			1.00
	Acetonitrile			0.75
	Acetophenone			1.00
	Acrolein			0.012
	Acrylamide			0.012
	Acrylic acid			0.19
	Acrylonitrile			0.017
	Allyl chloride			0.012

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120011
Permit Number: 0840-00033-V5
Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002 UNF02	Amiben			1.00
	Ammonia			0.56
	Aniline			0.29
	Antimony (and compounds)			0.032
	Arsenic (and compounds)			0.022
	Barium (and compounds)			0.181
	Benzene			0.12
	Benzidine			1.00
	Benzo(a)trichloride			1.00
	Benzyl chloride			1.00
	Beryllium (Table 51.1)			0.012
	Biphenyl			0.04
	Bromoform			1.00
	Cadmium (and compounds)			0.012
	Calcium cyanamide			1.00
	Captan			1.00
	Carbaryl			1.00
	Carbon disulfide			0.91
	Carbon tetrachloride			0.04
	Carbonyl sulfide			0.49
	Chlordane			1.00
	Chlorinated Dibenzo-P-Dioxins			5.0E-08
	Chlorinated dibenzofurans			5.0E-08
	Chlorine			1.74
	Chlorine dioxide			0.012
	Chloroacetic acid			1.00
	Chlorobenzene			0.012
	Chloroethane			1.00
	Chloroform			0.03
	Chloromethyl methyl ether			1.00
	Chloroprene			0.64
	Chromium VI (and compounds)			0.030
	Cobalt compounds			0.03

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
 Activity Number: PER20120011
 Permit Number: 0840-00033-V5
 Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002 UNF02	Copper (and compounds)			0.111
	Cresol			0.58
	Cumene			1.00
	Cyanide compounds			1.00
	Diaminotoluene (mixed isomers)			0.12
	Diazomethane			1.00
	Dibutyl phthalate			0.18
	Dichloromethane			0.26
	Dichlorvos			1.00
	Diethanolamine			1.00
	Diethyl Sulfate			1.00
	Dimethyl formamide			1.00
	Dimethyl phthalate			1.00
	Dimethyl sulfate			1.00
	Dimethylcarbamoyl chloride			1.00
	Epichlorohydrin			0.67
	Ethyl 4,4'-Dichlorobenzilate			1.00
	Ethyl Acrylate			0.58
	Ethyl benzene			1.01
	Ethylene glycol			0.95
	Ethylene oxide			0.017
	Ethyleneimine			1.00
	Ethylenethiourea			1.00
	Formaldehyde			0.12
	Glycol ethers (Table 51.1)			0.56
	Glycol ethers (Table 51.3)			1.00
	Heptachlor			1.00
	Hexachlorobenzene			0.41
	Hexachlorobutadiene			0.012
	Hexachlorocyclopentadiene			1.00
	Hexachloroethane			0.34
	Hexamethylene diisocyanate			1.00
	Hexamethylphosphoramide			1.00

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120011
Permit Number: 0840-00033-V5
Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002 UNF02	Hydrazine			0.012
	Hydrochloric acid			4.34
	Hydrofluoric acid			0.03
	Hydrogen cyanide			0.38
	Hydrogen sulfide			2.21
	Hydroquinone			1.00
	Iodomethane			1.00
	Isophorone			1.00
	Lindane			1.00
	Maleic anhydride			0.03
	Manganese (and compounds)			0.08
	Mercury (and compounds)			0.012
	Methanol			1.00
	Methoxychlor			1.00
	Methyl Isocyanate			1.00
	Methyl Tertiary Butyl Ether			1.00
	Methyl bromide			1.00
	Methyl chloride			0.89
	Methyl ethyl ketone			1.00
	Methyl isobutyl ketone			0.02
	Methyl methacrylate			1.00
	Methylene diphenyl diisocyanate			1.00
	Monomethyl hydrazine			1.00
	N,N-Diethyl aniline			1.00
	N,N-dimethylbenzenamine			1.00
	N-Nitroso-N-Methylurea			1.00
	N-Nitrosodimethylamine			1.00
	N-Nitrosomorpholine			1.00
	Naphthalene (and Methyl naphthalenes)			0.60
	Nickel (and compounds)			0.038
	Nitric acid			0.14
	Nitrobenzene			0.19
	Parathion			1.00

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
 Activity Number: PER20120011
 Permit Number: 0840-00033-V5
 Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002 UNF02	Pentachloronitrobenzene			1.00
	Phenol			0.18
	Phosgene			0.014
	Phosphine			1.00
	Phosphorus, Total (as P)			1.00
	Phthalic Anhydride			0.19
	Polychlorinated biphenyls			1.00
	Polynuclear Aromatic Hydrocarbons			0.012
	Propionaldehyde			0.34
	Propoxur			1.00
	Propylene oxide			0.34
	Propylenimine			1.00
	Pyridine			0.56
	Pyrocatechol			1.00
	Quinoline			1.00
	Quinone			1.00
	Selenium (and compounds)			0.056
	Styrene			0.60
	Sulfuric acid			42.38
	Tetrachloroethylene			0.64
	Titanium tetrachloride			1.00
	Toluene			1.01
	Toluene-2,4-diisocyanate			0.012
	Toluene-2,6-Diisocyanate			0.012
	Toxaphene			1.00
	Trichloroethylene			0.43
	Triethyl amine			1.00
	Trifluralin			1.00
	Urethane			1.00
	Vinyl acetate			0.63
	Vinyl bromide			1.00
	Vinyl chloride			0.11
	Vinylidene chloride			0.58

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120011
Permit Number: 0840-00033-V5
Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002 UNF02	Xylene (mixed isomers)			1.01
	Zinc (and compounds)			0.22
	alpha-Chloroacetophenone			1.00
	beta-Propiolactone			1.00
	bis(2-ethylhexyl)phthalate			1.00
	bis(Chloromethyl)ether			1.00
	n-Hexane			1.01
	n-butyl alcohol			1.00
	o-Aminoanisole			1.00
	o-dianisidine			1.00
	ortho-Tolidine			1.00
	ortho-Toluidine			1.00
	p,p'-DDE			1.00
	para-Phenylenediamine			1.00
	pentachloro-Phenol			1.00

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Group: PCS 0001 Spent Acid Process

Group Members: ARE 0002 CRG 0003 CRG 0004 EQT 0008 EQT 0150 EQT 0151 EQT 0161 EQT 0163 EQT 0164 EQT 0165 EQT 0167 EQT 0168 EQT 0169 EQT 0171 EQT 0176 EQT 0185 EQT 0277 FUG 0002

ARE 0002 M4 - West End Sump

- 1 [LAC 33:III.5107.A.2] Emits Class III TAP (via process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

CRG 0003 CRG003 - Spent Acid Tanks

Group Members: EQT 0008 EQT 0161 EQT 0163 EQT 0164 EQT 0165 EQT 0169 EQT 0171

- 2 [40 CFR 60.110b(e)] Complies with 40 CFR 60 Subpart Kb by complying with 40 CFR 65 Subparts C and G. Monitoring requirements of 40 CFR 60.116b(c), (e), (f)(1), and (g) still apply. Subpart Kb. [40 CFR 60.110b(e)]
- 3 [40 CFR 65.145(c)(2)] Equipment/operational data monitored by technically sound method at the approved frequency. Monitor the disposition of spent acid tank vent (Sulfuric Acid Unit No. 1 versus APVC). Subpart G. [40 CFR 65.145(c)(2)]
Which Months: All Year Statistical Basis: None specified
- 4 [40 CFR 65.42(b)(5)] Operate and maintain a closed vent system and a control device. Ensure that the control device is designed and operated to reduce inlet emissions of regulated material by 95% or greater, except during periods of planned routine maintenance or during a control system malfunction. Ensure that periods of planned routine maintenance do not exceed 240 hours per year. Subpart C. [40 CFR 65.42(b)(5)]
- 5 [40 CFR 65.47(b)] Equipment/operational data recordkeeping by electronic or hard copy once initially. Keep readily accessible records showing the dimensions of the storage vessel and an analysis of the capacity of the storage vessel. Keep records as long as the storage vessel is in operation. Subpart C. [40 CFR 65.47(b)]

CRG 0004 CRG004 - 99/Oleum/Spent Swing Tanks

Group Members: EQT 0167 EQT 0168

- 6 [40 CFR 60.110b(e)] Complies with 40 CFR 60 Subpart Kb by complying with 40 CFR 65 Subparts C and G. Monitoring requirements of 40 CFR 60.116b(c), (e), (f)(1), and (g) still apply. Subpart Kb. [40 CFR 60.110b(e)]
- 7 [40 CFR 65.145(c)(2)] Equipment/operational data monitored by technically sound method at the approved frequency. Monitor the disposition of spent acid tank vent (Sulfuric Acid Unit No. 1 versus APVC). Subpart G. [40 CFR 65.145(c)(2)]
Which Months: All Year Statistical Basis: None specified
- 8 [40 CFR 65.42(b)(5)] Operate and maintain a closed vent system and a control device. Ensure that the control device is designed and operated to reduce inlet emissions of regulated material by 95% or greater, except during periods of planned routine maintenance or during a control system malfunction. Ensure that periods of planned routine maintenance do not exceed 240 hours per year. Subpart C. [40 CFR 65.42(b)(5)]
- 9 [40 CFR 65.47(b)] Equipment/operational data recordkeeping by electronic or hard copy once initially. Keep readily accessible records showing the dimensions of the storage vessel and an analysis of the capacity of the storage vessel. Keep records as long as the storage vessel is in operation. Subpart C. [40 CFR 65.47(b)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Group: PCS 0001 Spent Acid Process

CRG 0004 CRG004 - 99/Oleum/Spent Swing Tanks

- 10 [LAC 33:III.501.C.6] The requirements listed under CRG004 for the 99/Oleum/Spent Swing Tanks (EQT167 & EQT168) only apply when these tanks are in Spent Acid Service.

EQT 0150 26 - Spent Acid Barge Loading Scrubber

- 11 [LAC 33:III.501.C.6] Pressure recordkeeping by electronic or hard copy once every four hours when barge vents are routed to scrubber. STATE ONLY.
- 12 [LAC 33:III.501.C.6] Pressure monitored by pressure instrument once every four hours when barge vents are routed to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 13 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 14 [LAC 33:III.501.C.6] pH monitored by pH instrument once every four hours when barge vent are routed to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 15 [LAC 33:III.501.C.6] pH ≥ 10 s.u. when barge vents are routed to scrubber. Permittee is allowed one excused excursion per semi-annual period. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 16 [LAC 33:III.501.C.6] This scrubber is a portable unit, permittee may occasionally move it and substitute a different scrubber unit. All specific requirements and emission limits will continue to apply.
- 17 [LAC 33:III.501.C.6] pH recordkeeping by electronic or hard copy once every four hours when barge vents are routed to scrubber. Because this scrubber is a portable unit, permittee may occasionally move it and substitute a different scrubber unit. All specific requirements and emission limits will continue to apply. STATE ONLY.
- 18 [LAC 33:III.501.C.6] Packed Column Spray Nozzle Pressure ≥ 15 psig when barge vents are routed to scrubber. Permittee is allowed one excused excursion per semi-annual period. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 19 [LAC 33:III.5107.A.2] Emits Class III TAP (via process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. STATE ONLY.

EQT 0151 27 - Acid Plant Vapor Combustor

- 20 [40 CFR 65.145(a)] Temperature ≥ 1512 F when regulated tanks are venting to the APVC; or VOC, Total ≥ 95 % destruction removal efficiency (DRE) when calculated by time-weighted average factoring in the amount of time vented to Sulfuric Acid Unit No. 1 (RLP 014). Subpart G. [40 CFR 65.145(a)]
Which Months: All Year Statistical Basis: Daily average
- 21 [40 CFR 65.145(a)] The owner or operator shall operate and maintain the nonflare control device so that the monitored parameters defined in the monitoring plan remain within the ranges specified in the Initial Compliance Status Report whenever emissions of regulated material are routed to the control device, except during periods of startup, shutdown, and malfunction. Subpart G. [40 CFR 65.145(a)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Group: PCS 0001 Spent Acid Process

EQT 0151 27 - Acid Plant Vapor Combustor

- 22 [40 CFR 65.145(c)(1)] Submit a monitoring plan containing the information in 40 CFR 65.165(b) to identify the parameters that will be monitored to assure proper operation of the control device, unless previously established under an applicable standard prior to the implementation date of 40 CFR 65. Subpart G. [40 CFR 65.145(c)(1)]
- 23 [40 CFR 65.145(c)(2)] Temperature monitored by temperature monitoring device at the approved frequency. Monitor the firebox temperature. Subpart G. [40 CFR 65.145(c)(2)]
Which Months: All Year Statistical Basis: Daily average
- 24 [40 CFR 65.163] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 65.163(a) through (e), as applicable. Subpart G.
- 25 [40 CFR 65.5(e)] Submit Startup, Shutdown, and Malfunction Report: Due by the 30th day following the end of each calendar half (or other calendar reporting period, as appropriate), unless the information is submitted with the periodic report. Include the information specified in 40 CFR 65.6(c)(1) through (c)(4), as appropriate. Subpart A. [40 CFR 65.5(c)]
- 26 [40 CFR 65.5(e)] Submit Periodic Report: Due semiannually, no later than 60 calendar days after the end of each six-month period. Include all information specified in subparts of 40 CFR 65 and in 40 CFR 65.5(f). Subpart A. [40 CFR 65.5(e)]
- 27 [40 CFR 65.6(b)(1)] Develop a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the regulated source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard. Address routine or otherwise predictable CPMS malfunctions. Develop the plan by the regulated source's implementation date as specified in 40 CFR 65.1(f), or for sources referenced from 40 CFR 63 Subpart F, by the compliance date specified in 40 CFR 63 Subpart F. Subpart A. [40 CFR 65.6(b)(1)]
- 28 [LAC 33:III.1101.B] Opacity \leq 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified
- 29 [LAC 33:III.1311.C] Opacity \leq 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: Six-minute average
- 30 [LAC 33:III.5107.A.2] Emits Class III TAP (via this source and process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

EQT 0176 20D120/30D240 - IFS Mix Tank

- 31 [LAC 33:III.2103.A] Each tank, reservoir, or container with a capacity less than 40,000 gallons but more than 250 gallons storing any VOC with a vapor pressure greater than 1.5 psia shall be equipped with a submerged fill pipe or a vapor loss control system.
- 32 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Group: PCS 0001 Spent Acid Process

EQT 0176 20D120/30D240 - IFS Mix Tank

- 33 [LAC 33:III.5107.A.2] Emits Class I and/or Class II and/or Class III TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

EQT 0185 M7 - 001 Wastewater Treatment Unit

- 34 [LAC 33:III.5107.A.2] Emits Class III TAP (via process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

EQT 0277 13 - Acid Plant Caustic Scrubber

- 35 [LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
- 36 [LAC 33:III.501.C.6] pH \geq 6 s.u. when venting to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: One-hour average
- 37 [LAC 33:III.501.C.6] pH recordkeeping by electronic or hard copy once every 15 minutes only when venting to scrubber. STATE ONLY.
- 38 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device continuously only when venting to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: One-hour average
- 39 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 40 [LAC 33:III.501.C.6] Flow rate \geq 315 gallons/min when venting to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: One-hour average
- 41 [LAC 33:III.501.C.6] pH monitored by pH instrument continuously only when venting to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 42 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy once every 15 minutes only when venting to scrubber. STATE ONLY.
- 43 [LAC 33:III.905] Install air pollution control facilities whenever practically, economically, and technologically feasible. When facilities have been installed on a property, use them and diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the facilities, even though the ambient air quality standards in affected areas are not exceeded.

FUG 0002 FUG-ACID - Acid Plant Fugitive Emissions

- 44 [40 CFR 65.143(a)(1)] Ensure that each closed vent system is designed and operated to collect the regulated material vapors from the emission point and to route the collected vapors to a control device. Subpart G. [40 CFR 65.143(a)(1)]
- 45 [40 CFR 65.143(a)(2)] Operate closed vent systems at all times when emissions are vented to them. Subpart G. [40 CFR 65.143(a)(2)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Group: PCS 0001 Spent Acid Process

FUG 0002 FUG-ACID - Acid Plant Fugitive Emissions

- 46 [40 CFR 65.143(a)(3)(ii)] Seal or closure mechanism monitored by visual inspection/determination monthly to ensure the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass line. Subpart G. [40 CFR 65.143(a)(3)(ii)]
Which Months: All Year Statistical Basis: None specified
- 47 [40 CFR 65.143(a)(3)(ii)] Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. Subpart G. [40 CFR 65.143(a)(3)(ii)]
- 48 [40 CFR 65.143(b)(1)(i)(A)] Closed vent system (hard piping): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency, as specified in 40 CFR 65.143(c). Subpart G. [40 CFR 65.143(b)(1)(i)(A)]
Which Months: All Year Statistical Basis: None specified
- 49 [40 CFR 65.143(b)(1)(i)(B)] Closed vent system (hard piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart G. [40 CFR 65.143(b)(1)(i)(B)]
Which Months: All Year Statistical Basis: None specified
- 50 [40 CFR 65.143(b)(1)(ii)] Closed vent system (ductwork): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once initially and annually, as specified in 40 CFR 65.143(c). Subpart G. [40 CFR 65.143(b)(1)(ii)]
Which Months: All Year Statistical Basis: None specified
- 51 [40 CFR 65.143(b)(2)(i)] Closed vent system (unsafe to inspect): Determine that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with 40 CFR 65.143(b)(1). Comply with this requirement instead of the requirements in 40 CFR 65.143(b)(1). Subpart G. [40 CFR 65.143(b)(2)(i)]
- 52 [40 CFR 65.143(b)(2)(ii)] Closed vent system (unsafe to inspect): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment as frequently as practicable during safe-to-monitor times but not more frequently than annually. Comply with this requirement instead of the requirements in 40 CFR 65.143(b)(1). Subpart G. [40 CFR 65.143(b)(2)(ii)]
Which Months: All Year Statistical Basis: None specified
- 53 [40 CFR 65.143(b)(3)(i)] Closed vent system (difficult to inspect): Determine that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters (7 feet) above a support surface. Comply with this requirement instead of the requirements in 40 CFR 65.143(b)(1). Subpart G. [40 CFR 65.143(b)(3)(i)]
- 54 [40 CFR 65.143(b)(3)(ii)] Closed vent system (difficult to inspect): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once every five years. Comply with this requirement instead of the requirements in 40 CFR 65.143(b)(1). Subpart G. [40 CFR 65.143(b)(3)(ii)]
Which Months: All Year Statistical Basis: None specified
- 55 [40 CFR 65.143(d)(1)] Closed vent system: Eliminate indications of a leak, or monitor the equipment according to the provisions in 40 CFR 65.143(c), if there are visible, audible or olfactory indications of leaks at the time of the annual visual inspections required by 40 CFR 65.143(b)(1)(i)(B). Subpart G. [40 CFR 65.143(d)(1)]
- 56 [40 CFR 65.143(d)(2)] Closed vent system: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after each leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later, except as specified in 40 CFR 65.143(d)(3). Subpart G. [40 CFR 65.143(d)(2)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Group: PCS 0001 Spent Acid Process

FUG 0002 FUG-ACID - Acid Plant Fugitive Emissions

- 57 [40 CFR 65.143(d)(3)] Closed vent system: Complete repairs as soon as practical, but not later than the end of the next closed vent system shutdown, if repair of a leak is technically infeasible without a closed vent system shutdown, or if it is determined that emissions from immediate repair would be greater than the emissions likely to result from delay of repair. Subpart G. [40 CFR 65.143(d)(3)]
- 58 [40 CFR 65.163] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 65.163(a) through (e), as applicable. Subpart G.
- 59 [LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
- 60 [LAC 33:III.5107.A.2] Emits Class III TAP (via this source and process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

PCS 0001 Spt-Proc - Spent Acid Process

Group Members: ARE 0002CRG 0003 CRG 0004 EQT 0008EQT 0150EQT 0151EQT 0161EQT 0163EQT 0164EQT 0165EQT 0167EQT 0168EQT 0169EQT 0171EQT 0176EQT 0185EQT 0277FUG 0002

- 61 [LAC 33:III.501.C.6] The total emissions of all pollutants listed for Process Group Spt-Proc (PCS 0001) in the table "Emission Rates for TAP/HAP & Other Pollutants" shall not exceed 0.56 tons/year. These emissions shall be calculated and recorded annually, both for each individual pollutant and the sum. These records shall be kept onsite and available for inspection by the Office of Environmental Compliance, Surveillance Division. Emissions greater than 0.56 tons/year for the sum of Spt-Proc pollutants in any calendar year shall be a violation of this permit and must be reported to the Office of Environmental Compliance, Enforcement Division.

Group: PCS 0002 TS Process

Group Members: ARE 0003CRG 0001 CRG 0002 EQT 0147EQT 0177EQT 0178EQT 0179EQT 0180EQT 0181EQT 0182EQT 0183EQT 0278EQT 0279EQT 0280EQT 0281EQT 0282EQT 0283EQT 0284
FUG 0003RLP 0013 RLP 0014

ARE 0003 M3 - Treatment Services Sumps

- 62 [LAC 33:III.5107.A.2] Emits Class III TAP (via process group PCS0002), and emits Class I and/or Class II TAP (via process group PCS0002) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

CRG 0001 CRG001 - 40D250, 40D280, and 40D200

Group Members: EQT 0177EQT 0178EQT 0180

- 63 [40 CFR 60.112b(a)(3)(i)] Closed vent system: Design to collect all VOC vapors and gases discharged from the storage vessel. Subpart Kb. [40 CFR 60.112b(a)(3)(i)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

CRG 0001 CRG001 - 40D250, 40D280, and 40D200

- 64 [40 CFR 60.112b(a)(3)(ii)] VOC, Total \geq 95 % reduction efficiency using a closed vent system and control device. Sulfuric Acid Unit No. 2 serves as the primary control device for these tanks. The TS Vapor Combustor serves as the secondary control device for these tanks. Subpart Kb. [40 CFR 60.112b(a)(3)(ii)]
- 65 [40 CFR 60.116b(b)] Which Months: All Year Statistical Basis: None specified
Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. Keep copies of all records for the life of the source as specified by 40 CFR 60.116b(a). Subpart Kb. [40 CFR 60.116b(b)]
- 66 [40 CFR 61.343(a)(1)(i)(A)] Fixed roof: Ensure that the cover and all openings are designed to operate with no detectable emissions as indicated by an instrument reading less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h). (Method 21). Subpart FF. [40 CFR 61.343(a)(1)(i)(A)]
- 67 [40 CFR 61.343(a)(1)(i)(B)] Fixed roof: Maintain each opening in a closed, sealed position at all times that waste is in the tank except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair, except as specified in 40 CFR 61.343(a)(1)(i)(C). Subpart FF. [40 CFR 61.343(a)(1)(i)(B)]
- 68 [40 CFR 61.343(a)(1)] Install, operate, and maintain a fixed-roof and closed-vent system that routes all organic vapors vented from the tank to a control device. Subpart FF. [40 CFR 61.343(a)(1)]
- 69 [40 CFR 61.343(c)] Fixed-roof: Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter to ensure that no cracks or gaps occur and that access doors and other openings are closed and gasketed properly. Subpart FF. [40 CFR 61.343(c)]
- 70 [40 CFR 61.343(d)] Which Months: All Year Statistical Basis: None specified
Make first efforts at repair as soon as practicable, but not later than 45 calendar days after a broken seal or gasket or other problem is identified, or when detectable emissions are measured, except as provided in 40 CFR 61.350. Subpart FF. [40 CFR 61.343(d)]
- 71 [40 CFR 61.349(a)(1)(iii)] Closed-vent system: Ensure that all gauging and sampling devices are gas-tight except when gauging or sampling is taking place. Subpart FF. [40 CFR 61.349(a)(1)(iii)]
- 72 [40 CFR 61.355] Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.
- 73 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
- 74 [40 CFR 63.133(a)(2)(i)] Operate and maintain a fixed roof and a closed-vent system that routes the organic hazardous air pollutants vapors vented from the wastewater tank to a control device. Subpart G. [40 CFR 63.133(a)(2)(i)]
- 75 [40 CFR 63.133(b)(1)(i)] Fixed roof: Maintain in accordance with the requirements specified in 40 CFR 63.148, except as provided in 40 CFR 63.133(b)(4). Subpart G. [40 CFR 63.133(b)(1)(i)]
- 76 [40 CFR 63.133(b)(1)(ii)] Fixed roof: Maintain each opening in a closed position at all times that the wastewater tank contains a Group 1 wastewater stream or residual removed from a Group 1 wastewater stream except when it is necessary to use the opening for wastewater sampling, removal, or for equipment inspection, maintenance, or repair. Subpart G. [40 CFR 63.133(b)(1)(ii)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

CRG 0001 CRG001 - 40D250, 40D280, and 40D200

- 77 [40 CFR 63.133(f)] Equipment/operational data monitored by technically sound method once initially and once every six months. Monitor for improper work practices in accordance with 40 CFR 63.143, except as specified in 40 CFR 63.133(e). Subpart G. [40 CFR 63.133(f)]
Which Months: All Year Statistical Basis: None specified
- 78 [40 CFR 63.133(g)] Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Inspect each wastewater tank for control equipment failures as defined in 40 CFR 63.133(g)(1)(i) through (g)(1)(ix) according to the schedule in 40 CFR 63.133(g)(2) and (g)(3). Subpart G. [40 CFR 63.133(g)]
Which Months: All Year Statistical Basis: None specified
- 79 [40 CFR 63.143(a)] Comply with the inspection requirements in 40 CFR 63 Subpart G Table 11. Subpart G. [40 CFR 63.143(a)]
- 80 [LAC 33:III.2103.E.1] VOC, Total \geq 95 % control efficiency using a vapor loss control system. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: None specified
- 81 [LAC 33:III.2103.E] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place. Routed to Sulfuric Acid Unit No. 2 or TS Vapour Combustor.
- 82 [LAC 33:III.2103.H.2] Determine compliance with LAC 33:III.2103.E using the methods in LAC 33:III.2103.H.2.a-e, where appropriate.
- 83 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

CRG 0002 CRG002 - 40D290, 40D210, 40D300, and 40D220

Group Members: EQT 0179 EQT 0181 EQT 0182 EQT 0183

- 84 [40 CFR 61.343(a)(1)(i)(A)] Fixed roof: Ensure that the cover and all openings are designed to operate with no detectable emissions as indicated by an instrument reading less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h). (Method 21). Subpart FF. [40 CFR 61.343(a)(1)(i)(A)]
- 85 [40 CFR 61.343(a)(1)(i)(B)] Fixed roof: Maintain each opening in a closed, sealed position at all times that waste is in the tank except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair, except as specified in 40 CFR 61.343(a)(1)(i)(C). Subpart FF. [40 CFR 61.343(a)(1)(i)(B)]
- 86 [40 CFR 61.343(a)(1)] Install, operate, and maintain a fixed-roof and closed-vent system that routes all organic vapors vented from the tank to a control device. Subpart FF. [40 CFR 61.343(a)(1)]
- 87 [40 CFR 61.343(c)] Fixed-roof: Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter to ensure that no cracks or gaps occur and that access doors and other openings are closed and gasketed properly. Subpart FF. [40 CFR 61.343(c)]
Which Months: All Year Statistical Basis: None specified
- 88 [40 CFR 61.343(d)] Make first efforts at repair as soon as practicable, but not later than 45 calendar days after a broken seal or gasket or other problem is identified, or when detectable emissions are measured, except as provided in 40 CFR 61.350. Subpart FF. [40 CFR 61.343(d)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

CRG 0002 CRG002 - 40D290, 40D210, 40D300, and 40D220

- 89 [40 CFR 61.349(a)(1)(iii)] Closed-vent system: Ensure that all gauging and sampling devices are gas-tight except when gauging or sampling is taking place. Subpart FF. [40 CFR 61.349(a)(1)(iii)]
- 90 [40 CFR 61.355] Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.
- 91 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
- 92 [40 CFR 63.133(a)(1)] Operate and maintain a fixed roof. Subpart G. [40 CFR 63.133(a)(1)]
- 93 [40 CFR 63.133(f)] Equipment/operational data monitored by technically sound method once initially and once every six months. Monitor for improper work practices in accordance with 40 CFR 63.143, except as specified in 40 CFR 63.133(e). Subpart G. [40 CFR 63.133(f)]
Which Months: All Year Statistical Basis: None specified
- 94 [40 CFR 63.133(g)] Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Inspect each wastewater tank for control equipment failures as defined in 40 CFR 63.133(g)(1)(i) through (g)(1)(ix) according to the schedule in 40 CFR 63.133(g)(2) and (g)(3). Subpart G. [40 CFR 63.133(g)]
Which Months: All Year Statistical Basis: None specified
- 95 [40 CFR 63.143(a)] Comply with the inspection requirements in 40 CFR 63 Subpart G Table 11. Subpart G. [40 CFR 63.143(a)]
- 96 [LAC 33:III.2103.A] Each tank, reservoir, or container with a capacity less than 40,000 gallons but more than 250 gallons storing any VOC with a vapor pressure greater than 1.5 psia shall be equipped with a submerged fill pipe or a vapor loss control system.
- 97 [LAC 33:III.2103.H.3] If required, Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 98 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0147 21 - TS Vapor Combustor

- 99 [40 CFR 60.112b(a)(3)(ii)] VOC, Total \geq 95 % reduction efficiency using a closed vent system and control device. Subpart Kb. [40 CFR 60.112b(a)(3)(ii)]
Which Months: All Year Statistical Basis: Three-hour average
- 100 [40 CFR 60.113b(c)(2)] Equipment/operational data monitored by the regulation's specified method(s) at the regulation's specified frequency. Monitor the parameters of the closed vent system and control device in accordance with the operating plan submitted to DEQ in accordance with 40 CFR 60.113b(c)(1) of this section, unless the plan was modified by DEQ during the review process. In this case, the modified plan applies. Therefore, monitor firebox temperature continuously. Subpart Kb. [40 CFR 60.113b(c)(2)]
Which Months: All Year Statistical Basis: None specified
- 101 [40 CFR 60.115b(c)(1)] Operating plan recordkeeping by electronic or hard copy at the approved frequency. Keep copies of all records for the life of the control equipment. Subpart Kb. [40 CFR 60.115b(c)(1)]
- 102 [40 CFR 60.115b(c)(2)] Monitoring data recordkeeping by electronic or hard copy upon measurement in accordance with the operating plan of 40 CFR 60.113b(c)(2). Keep copies of all records for at least two years. Subpart Kb. [40 CFR 60.115b(c)(2)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

EQT 0147 21 - TS Vapor Combustor

- 103 [40 CFR 61.349(a)(2)(i)(C)] Residence time ≥ 0.5 sec at a minimum temperature of 760 degrees C (1400 degrees F). Subpart FF. [40 CFR 61.349(a)(2)(i)(C)]
Which Months: All Year Statistical Basis: None specified
- 104 [40 CFR 61.349(f)] Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter. Include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections. Subpart FF. [40 CFR 61.349(f)]
Which Months: All Year Statistical Basis: None specified
- 105 [40 CFR 61.354(c)(1)] Temperature monitored by temperature monitoring device continuously. Install the temperature sensor at a representative location in the combustion chamber. Subpart FF. [40 CFR 61.354(c)(1)]
Which Months: All Year Statistical Basis: None specified
- 106 [40 CFR 61.354(c)] Inspect the firebox temperature results daily to ensure proper operation. Subpart FF. [40 CFR 61.354(c)]
- 107 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
- 108 [40 CFR 63.139(b)] Ensure that the control device is operating whenever organic hazardous air pollutants emissions are vented to the control device. Subpart G. [40 CFR 63.139(b)]
- 109 [40 CFR 63.139(c)(1)(iii)] Residence time ≥ 0.5 sec at a minimum temperature of 760 degrees C. The TS Vapor Combustor is the secondary control device for TS tanks that are subject to vapor control per 63.133(a)(2) if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.139(c)(1)(iii)]
Which Months: All Year Statistical Basis: None specified
- 110 [40 CFR 63.139(d)] Demonstrate that each control device or combination of control devices achieves the appropriate conditions specified in 40 CFR 63.139(c) by using one or more of the methods specified in 40 CFR 63.138(d)(1), (d)(2), or (d)(3), except as specified in (d)(4). Subpart G. [40 CFR 63.139(d)]
- 111 [40 CFR 63.143(e)(1)] Comply with the monitoring requirements specified in 40 CFR 63 Subpart G Table 13. Continuously monitor the firebox temperature. Subpart G. [40 CFR 63.143(e)(1)]
- 112 [40 CFR 63.143(g)] The firebox temperature monitoring equipment shall be installed, calibrated, and maintained according to manufacturer's specifications or other written procedures that provide adequate assurance that the equipment will monitor accurately. Subpart G. [40 CFR 63.143(g)]
- 113 [LAC 33:III.1101.B] Opacity ≤ 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified
- 114 [LAC 33:III.1311.C] Opacity ≤ 20 percent, except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: Six-minute average
- 115 [LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

EQT 0147 21 - TS Vapor Combustor

- 116 [LAC 33:III.2103.E.1] VOC, Total \geq 95 % control efficiency. Vapor loss control system shall be capable of minimum VOC control efficiency of 95%. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: Three-hour average
- 117 [LAC 33:III.2103.H.2] Determine compliance with LAC 33:III.2103.E using the methods in LAC 33:III.2103.H.2.a-e, where appropriate.
- 118 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 119 [LAC 33:III.5107.A.2] Emits Class III TAP (via this source and process group PCS0002), and emits Class I and/or Class II TAP (via process group PCS0002) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

EQT 0278 U1-Scbr - Unit 1 Tail Gas Scrubber

- 120 [LAC 33:III.905] Install air pollution control facilities whenever practically, economically, and technologically feasible. When facilities have been installed on a property, use them and diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the facilities, even though the ambient air quality standards in affected areas are not exceeded.

EQT 0279 U2-Scbr - Unit 2 Tail Gas Scrubber

- 121 [LAC 33:III.905] Install air pollution control facilities whenever practically, economically, and technologically feasible. When facilities have been installed on a property, use them and diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the facilities, even though the ambient air quality standards in affected areas are not exceeded.

EQT 0280 U1-Furn - Unit 1 Furnace

- 122 [40 CFR 61.342(c)(1)(i)] Waste streams containing benzene: Remove or destroy the benzene contained in the waste using a treatment process or wastewater treatment system that complies with the standards specified in 40 CFR 61.348. Subpart FF. [40 CFR 61.342(c)(1)(i)]
- 123 [40 CFR 61.348(e)] Maintain furnace pressure at -0.1 inches of water maximum, 10-second delay. Furnace openings shall operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in §61.355(h). Compliance with this requirement assures compliance with 40 CFR 61.348(e). [40 CFR 61.348(e), LAC 33:III.507.H.1.a]
- 124 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
- 125 [40 CFR 63.138(h)(2)(i)] Treat the wastewater stream or residual in a unit identified in, and complying with, 40 CFR 63.138(h)(1), (h)(2), or (h)(3). Rhodia will comply with (h)(2) which states a boiler or heater that has been issued a final permit under 40 CFR 270 and complies with 40 CFR 266 Subpart H. Subpart G. [40 CFR 63.138(h)(2)(i)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

EQT 0280 U1-Furn - Unit 1 Furnace

- 126 [40 CFR 65.145(a)] The owner or operator shall operate and maintain the nonflare control device so that the monitored parameters defined in the monitoring plan remain within the ranges specified in the Initial Compliance Status Report whenever emissions of regulated material are routed to the control device, except during periods of startup, shutdown, and malfunction. Subpart G. [40 CFR 65.145(a)]
- 127 [40 CFR 65.145(c)(1)] Submit a monitoring plan containing the information in 40 CFR 65.165(b) to identify the parameters that will be monitored to assure proper operation of the control device, unless previously established under an applicable standard prior to the implementation date of 40 CFR 65. Subpart G. [40 CFR 65.145(c)(1)]
- 128 [40 CFR 65.145(c)(1)] Temperature ≥ 1500 F when spent acid tanks are venting to Sulfuric Acid Unit No. 1. Subpart G. [40 CFR 65.145(c)(1)]
Which Months: All Year Statistical Basis: None specified
- 129 [40 CFR 65.145(c)(2)] The owner or operator shall monitor the parameters specified in the Initial Compliance Status Report or in the operating permit. Therefore, Combustion zone temperature shall be monitored. Records shall be generated as specified in 65.163(b)(1). [40 CFR 65.145(c)(2)]
- 130 [40 CFR 65.163] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 65.163(a) through (e), as applicable. Subpart G.
- 131 [LAC 33:III.1101.B] Opacity ≤ 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified

EQT 0281 U2-RFurn - Unit 2 Regen Furnace

- 132 [40 CFR 60.112b(a)(3)(ii)] VOC, Total ≥ 95 % reduction efficiency. Subpart Kb. [40 CFR 60.112b(a)(3)(ii)]
Which Months: All Year Statistical Basis: Three-hour average
- 133 [40 CFR 60.113b(c)(2)] Equipment/operational data monitored by the regulation's specified method(s) continuously. Monitor the parameters of the closed vent system and control device in accordance with the operating plan submitted to DEQ in accordance with 40 CFR 60.113b(c)(1) of this section, unless the plan was modified by DEQ during the review process. In this case, the modified plan applies. Therefore, monitor firebox temperature (Regen furnace) continuously. Subpart Kb. [40 CFR 60.113b(c)(2)]
Which Months: All Year Statistical Basis: None specified
- 134 [40 CFR 60.115b(c)(1)] Operating plan recordkeeping by electronic or hard copy at the approved frequency. Keep copies of all records for the life of the control equipment. Subpart Kb. [40 CFR 60.115b(c)(1)]
- 135 [40 CFR 60.115b(c)(2)] Monitoring data recordkeeping by electronic or hard copy upon measurement in accordance with the operating plan of 40 CFR 60.113b(c)(2). Keep copies of all records for at least two years. Subpart Kb. [40 CFR 60.115b(c)(2)]
- 136 [40 CFR 61.342(c)(1)(i)] Waste streams containing benzene: Remove or destroy the benzene contained in the waste using a treatment process or wastewater treatment system that complies with the standards specified in 40 CFR 61.348. Subpart FF. [40 CFR 61.342(c)(1)(i)]
- 137 [40 CFR 61.348(e)] Maintain furnace pressure at -0.1 inches of water maximum, 10-second delay. Furnace openings shall operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in §61.355(h). Compliance with this requirement assures compliance with 40 CFR 61.348(e). [40 CFR 61.348(e), LAC 33:III.507.H.1.a]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

EQT 0281 U2-RFurn - Unit 2 Regen Furnace

- 138 [40 CFR 61.349(a)(2)(i)(C)] Residence time ≥ 0.5 sec at a minimum temperature of 760 degrees C (1400 degrees F) in the Regen furnace. Subpart FF. [40 CFR 61.349(a)(2)(i)(C)]
Which Months: All Year Statistical Basis: None specified
- 139 [40 CFR 61.349(f)] Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter. Include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections. Subpart FF. [40 CFR 61.349(f)]
Which Months: All Year Statistical Basis: None specified
- 140 [40 CFR 61.354(c)(5)] Equipment/operational data monitored by technically sound method continuously. Monitor a parameter that indicates good combustion operating practices are being used. Subpart FF. [40 CFR 61.354(c)(5)]
Which Months: All Year Statistical Basis: None specified
- 141 [40 CFR 61.354(c)(5)] Equipment/operational data recordkeeping by recorder continuously. Record a parameter that indicates good combustion operating practices are being used. Subpart FF. [40 CFR 61.354(c)(5)]
- 142 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
- 143 [40 CFR 63.138(h)(2)(i)] Treat the wastewater stream or residual in a unit identified in, and complying with, 40 CFR 63.138(h)(1), (h)(2), or (h)(3). Rhodia will comply with (h)(2) which states a boiler or heater that has been issued a final permit under 40 CFR 270 and complies with 40 CFR 266 Subpart H. Subpart G. [40 CFR 63.138(h)(2)(i)]
- 144 [40 CFR 63.139(c)(1)(iii)] Route organic hazardous air pollutant emissions to an enclosed combustion device having a minimum Residence time ≥ 0.5 sec at a minimum temperature of 760 degrees C. Unit No. 2 Regen furnace is the primary control device for TS tanks that are subject to vapor control per 63.133(a)(2) if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to us. Per 63.139(d)(4)(iii)(A), this unit is exempt from 63.139(d)(1)-(3) and 63.143. Subpart G. [40 CFR 63.139(c)(1)(iii)]
Which Months: All Year Statistical Basis: None specified
- 145 [LAC 33:III.1101.B] Opacity ≤ 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified
- 146 [LAC 33:III.2103.E.1] VOC, Total ≥ 95 % control efficiency. Vapor loss control system shall be capable of minimum VOC control efficiency of 95% for compliance of all tanks vented to it. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: Three-hour average
- 147 [LAC 33:III.2103.H.2] Determine compliance with LAC 33:III.2103.E using the methods in LAC 33:III.2103.H.2.a-e, where appropriate.
- 148 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0282 U2-SFurn - Unit 2 Sulfur Furnace

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

EQT 0282 U2-SFurn - Unit 2 Sulfur Furnace

- 149 [LAC 33:III.1101.B] Opacity \leq 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified

EQT 0283 U1-Proc - Unit 1 Process

- 150 [LAC 33:III.1511.E] Production of Sulfuric acid monitored by technically sound method daily. Monitor the H₂SO₄ production rate.
Which Months: All Year Statistical Basis: None specified
151 [LAC 33:III.1513.A.3] Production of Sulfuric acid recordkeeping by electronic or hard copy daily. Record the H₂SO₄ production rate.
152 [LAC 33:III.5109.A.1] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. MACT applies for metals only and therefore is determined to be compliance with the BIF permit.

EQT 0284 U2-Proc - Unit 2 Process

- 153 [LAC 33:III.1511.E] Sulfuric acid monitored by technically sound method daily. Monitor the H₂SO₄ production rate.
Which Months: All Year Statistical Basis: None specified
154 [LAC 33:III.1513.A.3] Sulfuric acid recordkeeping by electronic or hard copy daily. Record the H₂SO₄ production rate.
155 [LAC 33:III.5109.A.1] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. MACT applies for metals only and therefore is determined to be compliance with the BIF permit.

FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

- 156 [40 CFR 60.112b(a)(3)(i)] Closed vent system (no detectable emissions): VOC, Total < 500 ppm above background as indicated by instrument readings and visual inspections, as determined in Subpart VV, 40 CFR 60.485(c). Subpart Kb. [40 CFR 60.112b(a)(3)(i)]
Which Months: All Year Statistical Basis: None specified
157 [40 CFR 60.112b(a)(3)] Equip with a closed vent system and control device. Design the closed vent system to collect all VOC vapors and gases discharged from the storage vessel and operate with no detectable emissions. Subpart Kb. [40 CFR 60.112b(a)(3)]
158 [40 CFR 61.343(a)(1)(i)(A)] Fixed roof: Ensure that the cover and all openings are designed to operate with no detectable emissions as indicated by an instrument reading less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h). Subpart FF. [40 CFR 61.343(a)(1)(i)(A)]
159 [40 CFR 61.345(a)(1)] Install, operate, and maintain a cover on each container used to handle, transfer, or store waste. Subpart FF. [40 CFR 61.345(a)(1)]
160 [40 CFR 61.348(e)(3)ii] If the cover and closed-vent system operates such that the treatment process and wastewater treatment system unit are maintained at a pressure less than atmospheric pressure, the owner or operator may operate the system with an opening that is not sealed and kept closed at all times provided the opening is designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 61.355(h). Subpart FF. [40 CFR 61.348(e)(3)ii]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

- 161 [40 CFR 61.349(a)(1)(i)] Closed-vent system: Operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h). Subpart FF. [40 CFR 61.349(a)(1)(i)]
- 162 [40 CFR 61.349(f)] Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter. Include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections. Subpart FF. [40 CFR 61.349(f)]
- 163 [40 CFR 61.354(f)(1)] Which Months: All Year Statistical Basis: None specified
Closed-vent system (bypass line): Seal or closure mechanism monitored by visual inspection/determination monthly. Check the position of the valve and the condition of the car-seal or closure mechanism required under 40 CFR 61.349(a)(1)(ii) to ensure that the valve is maintained in the closed position and the vent stream is not diverted through the bypass line. Subpart FF. [40 CFR 61.354(f)(1)]
- 164 [40 CFR 61.356] Which Months: All Year Statistical Basis: None specified
Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
- 165 [40 CFR 63.148(c)(1)] Conduct initial inspection of closed vent system on TS tanks in accordance with Method 21 as specified in 40 CFR 63.148(c)(1). Conduct annual inspection for visible, audible, or olfactory indications of leaks. This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(c)(1)]
- 166 [40 CFR 63.148(f)(2)] Vapor collection system or closed vent system (bypass lines): Seal or closure mechanism monitored by visual inspection/determination monthly to ensure the valve is maintained in the closed position and the vent stream is not diverted through the bypass line. This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(f)(2)]
- 167 [40 CFR 63.148(f)(2)] Which Months: All Year Statistical Basis: None specified
Vapor collection system or closed vent system (bypass lines): Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(f)(2)]
- 168 [40 CFR 63.148(i)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.148(i)(1) through (i)(6). This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(i)]
- 169 [40 CFR 63.148(j)] Submit the information specified in 40 CFR 63.148(j)(1) through (j)(3) with the reports required by 40 CFR 63.182(b) of subpart H or 40 CFR 63.152(c). This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(j)]
- 170 [LAC 33:III.501] Comply with 40 CFR 264 BB and 40 CFR 61 Subpart V by implementing the Louisiana Consolidated Fugitive Emission Program Guidelines. Compliance is achieved through compliance with LA MACT Determination for nonHON Sources.
- 171 [LAC 33:III.5107.A.2] Emits Class III TAP (via process group PCS0002), and emits Class I and/or Class II TAP (via process group PCS0002) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

- 172 [LAC 33:III.5109.A] Pressure relief device in gas/vapor service: VOC, Total < 500 ppm except during pressure releases, as measured by the method specified in Section P.3, as specified in Section F.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
Which Months: All Year Statistical Basis: None specified
- 173 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service (percent leaking valves ≤ 2 for two consecutive semiannual leak detection periods):
VOC, Total monitored by the regulation's specified method(s) annually, as specified in Paragraph J.2.b of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Monitor using the method specified in Section P. If the percentage of valves leaking is greater than 2 for any monitoring period, comply with the requirements as described in Section I, as specified in Paragraph J.2.c of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Optional alternative to quarterly monitoring.
Which Months: All Year Statistical Basis: None specified
- 174 [LAC 33:III.5109.A] Comply with the test methods and procedures in Section P, as specified in Subsections P.1 through P.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 175 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service (opened or otherwise had the seal broken): VOC, Total monitored by the regulation's specified method(s) within 90 days after being returned to VOTAP service. Monitor each connector that has been opened or has otherwise had the seal broken, including those determined to be unrepairable prior to process unit shutdown, as specified in Paragraph O.8.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Section P. If the follow-up monitoring detects a leak, initiate repair provisions specified in Subsection O.9, unless it is determined to be unrepairable, in which case it is counted as unrepairable.
Which Months: All Year Statistical Basis: None specified
- 176 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Ensure that the barrier fluid is not in VOTAP service and, if the pump is covered by standards under NSPS, is not in VOC service, as specified in Paragraph D.4.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
- 177 [LAC 33:III.5109.A] Delay of Repair: Repair equipment before the end of the next process unit shutdown, if repair is technically infeasible without a process unit shutdown, as specified in Subsection M.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 178 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Equip each barrier fluid system with a sensor that will detect failure of the seal system, the barrier fluid system, or both, as specified in Paragraph D.4.c of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
- 179 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service (welded completely around the circumference of the interface or physically removed and the pipe welded together): Equipment/operational data monitored by the regulation's specified method(s) within three months after being welded. Check the integrity of the weld by monitoring according to the procedures in Section P or by testing using x-ray, acoustic monitoring, hydrotesting, or other applicable method, as specified in Subsection O.7 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection O.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

- 180 [LAC 33:III.5109.A] Instrument systems and pressure relief devices in liquid service; and pumps, valves, connectors, and agitators in heavy liquid service: VOC, Total monitored by the regulation's specified method(s) within 5 days of finding evidence of a potential leak by visual, audible, olfactory, or any other detection method, as specified in Section K.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.2. If an instrument reading of 10000 ppm or greater for agitators, 2000 ppm or greater for pumps or 1000 ppm or greater for valves, connectors, instrument systems, or pressure relief devices is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection K.3.
Which Months: All Year Statistical Basis: None specified
- 181 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service: Repair Leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Subsection O.8. Make a first attempt at repair no later than 5 calendar days after each leak is detected. If a leak is detected, monitor the for leaks within the first 90 days after its repair, as specified in Subsection O.9 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 182 [LAC 33:III.5109.A] Pressure relief device in gas/vapor service: After each pressure release, return to a condition of no leakage, as indicated by an instrument reading of less than 500 ppm, as soon as practicable, but no later than five calendar days after each pressure release, except as provided in Section M, as specified in Section F.2.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 183 [LAC 33:III.5109.A] Identify each piece of equipment in a process unit subject to this MACT determination such that it can be distinguished readily from equipment that is not subject to this MACT determination, as specified in Subsection C.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 184 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service (skip period leak detection and repair): Notify DEQ 30 days before implementing any of the alternate provisions of Section J, as specified in Subsection R.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 185 [LAC 33:III.5109.A] Sampling connection systems: Equip with a closed-purge system or closed-vent system, except as provided for in Section C, as specified in Subsection G.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Ensure that this system collects or captures the sample purge for return to the process.
- 186 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service (percent of leaking connectors > 2): VOC, Total monitored by the regulation's specified method(s) quarterly until good performance is obtained or until four quarterly monitorings have been performed, as specified in Subsections O.2 and O.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If good performance has not been obtained after four quarters of monitoring, monitor the remaining unchecked connectors within six months of the last quarterly monitoring period, as specified in Subsection O.6 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If monitoring of the remaining connectors indicates good performance, monitor in accordance with Subsection O.4. If monitoring of the remaining connectors indicates that good performance has not been obtained, monitor in accordance with Subsection O.5. Monitor using the method specified in Section P. If an instrument reading \geq 1000 ppm is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection O.9, except as provided in Section M.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

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Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

- 187 [LAC 33:III.5109.A] Pumps in light liquid service: Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection D.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.
- 188 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service: Calculate the percent leaking connectors using the equation in Subsection O.12 for use in determining the monitoring frequency, as specified in Subsection O.12 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 189 [LAC 33:III.5109.A] Pumps in light liquid service: VOC, Total monitored by the regulation's specified method(s) quarterly. Monitor to detect leaks using the methods specified in Subsection P.2, except as provided in Subsection C.4 and Subsections D.4, D.5, and D.6, as specified in Paragraph D.1.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If an instrument reading of 2000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate repair provisions as specified in Subsection D.3.
Which Months: All Year Statistical Basis: None specified
- 190 [LAC 33:III.5109.A] Instrument systems and pressure relief devices in liquid service; and pumps, valves, connectors, and agitators in heavy liquid service: Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection K.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.
- 191 [LAC 33:III.5109.A] Submit report: Due semiannually starting six months after the initial report required in Subsection R.1. Include the information specified in Paragraphs R.2.a through R.2.e, as specified in Subsection R.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 192 [LAC 33:III.5109.A] Open-ended valves or lines: Monitor and repair in accordance with Section I, as specified in Subsection H.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 193 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Equipment/operational data monitored by visual inspection/determination daily, if pump is in service. Check sensor daily or equip with an audible alarm, as specified in Subparagraph D.4.e.i of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criterion determined in Paragraph D.4.e.ii, a leak is detected. If a leak is detected, initiate repair provisions specified in Paragraphs D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1.
Which Months: All Year Statistical Basis: None specified
- 194 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service (difficult-to-monitor): VOC, Total monitored by the regulation's specified method(s) at the regulation's specified frequency. Maintain a written plan that requires monitoring of the valve at least once per calendar year, as specified in Subsection I.6.c of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.2. Comply with this requirement instead of the requirements in Subsection I.1.
Which Months: All Year Statistical Basis: None specified
- 195 [LAC 33:III.5109.A] VOC, Total recordkeeping by logbook within 90 days of placing equipment back in service that had been physically removed from service, disassembled or dismantled. Maintain records as required in Subsection Q.5, as specified in Subsection C.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).

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Group: PCS 0002 TS Process

FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

- 196 [LAC 33:III.5109.A] Open-ended valves or lines: Equip with a cap, blind flange, plug, or a second valve that seals the open end at all times except during operations requiring process fluid flow through the open-ended valve or line or during maintenance and repair, as specified in Subsection H.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 197 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service (percent of leaking connectors ≤ 2): VOC, Total monitored by the regulation's specified method(s) annually, as specified in Subsections O.2 and O.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Annual monitoring shall be performed per the Louisiana Fugitive Emission Program Consolidation Guidelines which states as once every four quarters. Monitor using the method specified in Section P. If an instrument reading ≥ 1000 ppm is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection O.9, except as provided in Section M.
Which Months: All Year Statistical Basis: None specified
- 198 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar), if pump is in service, as specified in Paragraph D.4.d of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate repair provisions specified in Paragraphs D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1.
Which Months: All Year Statistical Basis: None specified
- 199 [LAC 33:III.5109.A] Pressure relief device in gas/vapor service: VOC, Total monitored by the regulation's specified method(s) within 5 days (calendar) after the pressure release to confirm the condition of no leakage, as indicated by an instrument reading of less than 500 ppm above background, as specified in Section F.2.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.3.
Which Months: All Year Statistical Basis: None specified
- 200 [LAC 33:III.5109.A] Open-ended valves or lines (equipped with a second valve): Operate in a manner such that the valve on the process fluid end is closed before the second valve is closed, as specified in Subsection H.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 201 [LAC 33:III.5109.A] Sampling connection systems (closed-purge or closed-vent system): Return the purged process fluid directly to the process line with zero VOTAP emissions to the atmosphere, or collect and recycle the purged process fluid with zero VOTAP emissions to the atmosphere, or be designed and operated to capture and transport all the purged process fluid to a control device that complies with the requirements of Section N, as specified in Subsection G.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 202 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service (difficult-to-monitor): Demonstrate that the valve cannot be monitored without elevating the monitoring personnel more than two meters above a support service, as specified in Subsection I.6.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection I.1.
- 203 [LAC 33:III.5109.A] Attach a weatherproof and readily visible identification, marked with the equipment identification, to leaking equipment, as specified in Subsection Q.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 204 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both, as specified in Subparagraph D.4.e.ii of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.

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Group: PCS 0002 TS Process

FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

- 205 [LAC 33:III.5109.A] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in Subsections Q.1 through Q.13 as applicable, as specified in Section Q of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 206 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service (percent leaking valves ≥ 4): VOC, Total monitored by the regulation's specified method(s) monthly, as specified in Subsection I.7 of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Monitor using the method specified in Subsection P.2. Initiate monthly monitoring within 60 days of the previous monitoring and continue until the percent of leaking valves is less than 4, at which time monitoring can be performed in accordance with Subsection I.1.
Which Months: All Year Statistical Basis: None specified
- 207 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service: Repair leaks as soon as practicable, but no later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection I.3 and I.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.
- 208 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure, or equip with a barrier fluid degassing reservoir that is connected by a closed-vent system to a control device that complies with the requirements of Section N, or equip with a system that purges the barrier fluid into a process stream with zero VOTAP emissions to the atmosphere, as specified in Paragraph D.4.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
- 209 [LAC 33:III.5109.A] VOC, Total monitored by technically sound method within 90 days of placing equipment back in service that had been physically removed from service, disassembled or dismantled to determine if it is leaking, as specified in Subsection C.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
Which Months: All Year Statistical Basis: None specified

RLP 0013 2 - Sulfuric Acid Unit No. 2

- 210 [40 CFR 60.83(a)(1)] Acid mist ≤ 0.15 lb/ton (0.075 kg/metric ton) of acid produced, expressed as H₂SO₄, the production being expressed as 100% H₂SO₄.
Subpart H. [40 CFR 60.83(a)(1)]
Which Months: All Year Statistical Basis: None specified
- 211 [40 CFR 60.83(a)(2)] Opacity < 10 percent. Subpart H. [40 CFR 60.83(a)(2)]
Which Months: All Year Statistical Basis: None specified
- 212 [40 CFR 60.85(a)] Use as reference methods and procedures the test methods in 40 CFR 60 Appendix A or other methods and procedures as specified in 40 CFR 60.85, except as provided in 40 CFR 60.8(b), in conducting the performance tests required in 40 CFR 60.8. Subpart H. [40 CFR 60.85(a)]
- 213 [40 CFR 60.85(b)] Determine compliance with the SO₂, acid mist, and visible emission standards in 40 CFR 60.82 and 60.83 using the test methods and procedures specified in 40 CFR 60.85(b) and (c), as applicable. Subpart H. [40 CFR 60.85(b)]
- 214 [40 CFR 60.Subpart H] Rhodia shall comply with the monitoring requirements for SO₂ set forth in 40 CFR 60 Subpart A, Subpart H, Appendix B, and Appendix F, except where superseded by the Alternative Monitoring Plan approved by EPA and LDEQ on July 23, 2007.
- 215 [40 CFR 60.Subpart H] Rhodia shall comply with the reporting requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A, Subpart H, Appendix B and Appendix F.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

RLP 0013 2 - Sulfuric Acid Unit No. 2

- 216 [40 CFR 60.Subpart H] Rhodia shall comply with the recordkeeping requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A, Subpart H and Appendix F.
- 217 [40 CFR 60.Subpart H] Shall meet a 365-day rolling average limit of 2.2 lbs. of SO₂ per ton of 100% sulfuric acid produced, averaged over all operating hours in a rolling 365-day period. This limit applies at all times, including periods of startup, shutdown and malfunction. Operating hours are defined as all periods when sulfur-bearing compounds, except natural gas and fuel oil, are fed to the furnace. (Commence monitoring on January 1, 2011 and demonstrate compliance by January 1, 2012.)
Which months: All year Statistical Basis: 365-day rolling average.
- 218 [40 CFR 60.Subpart H] Shall meet a limit of 3.0 lbs SO₂/ton, expressed as lbs. of SO₂ emissions per ton of 100% sulfuric acid produced, averaged over each rolling 3-hour period. This limit does not apply during periods of Startup, Shutdown or Malfunction. For the purposes of this requirement, startup and shutdown are defined as follows. Startup is the 24-hour period when the sulfur-bearing feed starts after a main gas blower shutdown. Shutdown is the stopping of operation for any reason, beginning at the time sulfur-bearing feeds (except for natural gas and fuel oil) to the furnace cease.
- 219 [LAC 33:III.501.C.6] Rhodia shall install continuous emission monitors (CEMs) for NO_x as part of the debottlenecking project. STATE ONLY.
- 220 [LAC 33:III.5107.A.2] Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

RLP 0014 3 - Sulfuric Acid Unit No. 1

- 221 [40 CFR 60.83(a)(1)] Acid mist ≤ 0.15 lb/ton (0.075 kg/metric ton) of acid produced, expressed as H₂SO₄, the production being expressed as 100% H₂SO₄.
Subpart H. [40 CFR 60.83(a)(1)]
Which Months: All Year Statistical Basis: None specified
- 222 [40 CFR 60.83(a)(2)] Opacity < 10 percent. Subpart H. Effective starting on May 1, 2012. [40 CFR 60.83(a)(2)]
Which Months: All Year Statistical Basis: None specified
- 223 [40 CFR 60.85(a)] Effective May 1, 2012, use as reference methods and procedures the test methods in 40 CFR 60 Appendix A or other methods and procedures as specified in 40 CFR 60.85, except as provided in 40 CFR 60.8(b), in conducting the performance tests required in 40 CFR 60.8. Subpart H. [40 CFR 60.85(a)]
- 224 [40 CFR 60.85(b)] Effective May 1, 2012, determine compliance with the SO₂, acid mist, and visible emission standards in 40 CFR 60.82 and 60.83 using the test methods and procedures specified in 40 CFR 60.85(b) and (c), as applicable. Subpart H. [40 CFR 60.85(b)]
- 225 [40 CFR 60.Subpart H] Effective May 1, 2012, meet a 365-day rolling average limit of 1.9 lbs. of SO₂ per ton of 100% sulfuric acid produced, averaged over all operating hours in a rolling 365-day period. This limit applies at all times, including periods of startup, shutdown and malfunction. Operating hours are defined as all periods when sulfur-bearing compounds, except natural gas and fuel oil, are fed to the furnace. (Commence monitoring on May 1, 2012 and demonstrate compliance by May 1, 2013.)
Which months: All year Statistical Basis: 365-day rolling average.
- 226 [40 CFR 60.Subpart H] Effective May 1, 2012, Rhodia will comply with the reporting requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A, Subpart H, Appendix B and Appendix F.

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AI ID: 1314 - Rhodia Inc

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Group: PCS 0002 TS Process

RLP 0014 3 - Sulfuric Acid Unit No. 1

- 227 [40 CFR 60.Subpart H] Effective May 1, 2012, Rhodia will comply with the monitoring requirements for SO₂ set forth in 40 CFR 60 Subpart A, Subpart H, Appendix B, and Appendix F, except where superseded by the Alternative Monitoring Plan approved by EPA and LDEQ on July 23, 2007.
- 228 [40 CFR 60.Subpart H] Effective May 1, 2012, Rhodia will comply with the recordkeeping requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A, Subpart H and Appendix F.
- 229 [40 CFR 60.Subpart H] Effective May 1, 2012, meet a limit of 3.0 lbs SO₂/ton, expressed as lbs. of SO₂ emissions per ton of 100% sulfuric acid produced, averaged over each rolling 3-hour period. This limit does not apply during periods of Startup, Shutdown or Malfunction. For the purposes of this requirement, startup and shutdown are defined as follows. Startup is the 24-hour period when the sulfur-bearing feed starts after a main gas blower shutdown. Shutdown is the stopping of operation for any reason, beginning at the time sulfur-bearing feeds (except for natural gas and fuel oil) to the furnace cease.
- 230 [LAC 33:III.501.C.6] Rhodia shall install continuous emission monitors (CEMs) for NO_x as part of the debottlenecking project. STATE ONLY.
- 231 [LAC 33:III.5107.A.2] Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

PCS 0002 TS-Proc - TS Process

Group Members: ARE 0003CRG 0001 CRG 0002 EQT 0147EQT 0177EQT 0178EQT 0179EQT 0180EQT 0181EQT 0182EQT 0183EQT 0278EQT 0279EQT 0280EQT 0281EQT 0282EQT 0283EQT 0284

FUG 0003RLP 0013 RLP 0014

- 232 [LAC 33:III.501.C.6] The total emissions of all pollutants listed for Process Group TS-Proc (PCS 0002) in the table "Emission Rates for TAP/HAP & Other Pollutants" shall not exceed 2.02 tons/year. These emissions shall be calculated and recorded annually, both for each individual pollutant and the sum. These records shall be kept onsite and available for inspection by the Office of Environmental Compliance, Surveillance Division. Emissions greater than 2.02 tons/year for the sum of TS-Proc pollutants in any calendar year shall be a violation of this permit and must be reported to the Office of Environmental Compliance, Enforcement Division.

EQT 0140 10 - Preheater; Acid Unit No. 1

- 233 [LAC 33:III.1101.B] Opacity \leq 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
- 234 [LAC 33:III.1313.C] Which Months: All Year Statistical Basis: None specified
Total suspended particulate \leq 0.6 lb/MMBTU of heat input.
- 235 [LAC 33:III.1513.C] Which Months: All Year Statistical Basis: None specified
Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

EQT 0141 11 - Lime Silos

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

EQT 0141 11 - Lime Silos

- 236 [LAC 33:III.1311.B] Total suspended particulate \leq 32.95 lb/hr using a max hourly operating rate throughput of 22.5 tons/hr. The rate of emission shall be the total of all emission points from the source.
Which Months: All Year Statistical Basis: None specified
- 237 [LAC 33:III.1311.C] Opacity \leq 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: Six-minute average

EQT 0142 12 - Oleum Loading Vent Scrubber

- 238 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy once every four hours. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. STATE ONLY.
- 239 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 240 [LAC 33:III.501.C.6] Maximum scrubber solution strength of Sulfuric acid \leq 20 percent. Maximum acid strength of 20%, based on a weekly sample. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. During periods of planned routine maintenance on the scrubber, the oleum tank and loading vents will either be routed to the process or to a backup portable scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: Weekly maximum
- 241 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device once every four hours. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 242 [LAC 33:III.501.C.6] Maximum scrubber solution strength of Sulfuric acid recordkeeping by electronic or hard copy weekly. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. STATE ONLY.
- 243 [LAC 33:III.501.C.6] Maximum scrubber solution strength of Sulfuric acid monitored by product sampling weekly. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: Weekly maximum
- 244 [LAC 33:III.501.C.6] Scrubber Flow rate \geq 50 gallons/min. Based on a four-hour block average. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. During periods of planned routine maintenance on the scrubber, the oleum tank and loading vents will either be routed to the process or to a backup portable scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average

EQT 0146 20 - Sulfur Feed Tank

- 245 [LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

EQT 0149 24 - Oleum Barge Loading Scrubber

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

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EQT 0149 24 - Oleum Barge Loading Scrubber

- 246 [LAC 33:III.501.C.6] Flow rate \geq 15 gallons/min when barge vents are routed to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 247 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy once every four hours when barge vents are routed to scrubber. STATE ONLY.
- 248 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device once every four hours when barge vents are routed to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 249 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 250 [LAC 33:III.501.C.6] Scrubber water must be replaced after every two barges loaded. STATE ONLY.

EQT 0152 28 - Gasoline Storage Tank

- 251 [LAC 33:III.2103.A] Each tank, reservoir, or container with a capacity less than 40,000 gallons but more than 250 gallons storing any VOC with a vapor pressure greater than 1.5 psia shall be equipped with a submerged fill pipe or a vapor loss control system.
- 252 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0153 6-90 - Package Boiler

- 253 [40 CFR 60.44b(a)] Nitrogen oxides \leq 0.1 lb/MMBTU heat input (expressed as NO₂), except as provided in 40 CFR 60.44b(k). The nitrogen oxide standards apply at all times, including periods of startup, shutdown, or malfunction. Subpart Db. [40 CFR 60.44b(a)]
Which Months: All Year Statistical Basis: Thirty-day rolling average
- 254 [40 CFR 60.46b(c)] Determine compliance with the NO_x standards in 40 CFR 60.44b through performance testing under 40 CFR 60.46b(e) or (f), or under 40 CFR 60.46b(g) or (h), as applicable. Subpart Db. [40 CFR 60.46b(c)]
- 255 [40 CFR 60.48b(b)(1)] Oxygen or Carbon dioxide recordkeeping by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(b)(1)]
- 256 [40 CFR 60.48b(b)(1)] Oxygen or Carbon dioxide monitored by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(b)(1)]
Which Months: All Year Statistical Basis: One-hour average
- 257 [40 CFR 60.48b(b)(1)] Nitrogen oxides monitored by CMS continuously. Calculate nitrogen oxides emission rates as specified in 40 CFR 60.48b(d), except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(b)(1)]
Which Months: All Year Statistical Basis: One-hour average
- 258 [40 CFR 60.48b(b)(1)] Nitrogen oxides recordkeeping by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(b)(1)]
- 259 [40 CFR 60.48b(c)] Operate NO_x continuous monitoring systems and record data during all periods of operation except for continuous monitoring system breakdowns and repairs. Record data during calibration checks, and zero and span adjustments. Subpart Db. [40 CFR 60.48b(c)]
- 260 [40 CFR 60.48b(e)] Nitrogen oxides: Follow the procedures under 40 CFR 60.13 and 40 CFR 60.48b(e)(1) through (e)(3) for installation, evaluation, and operation of the NO_x continuous monitoring system. Subpart Db. [40 CFR 60.48b(e)]

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AI ID: 1314 - Rhodia Inc

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EQT 0153 6-90 - Package Boiler

- 261 [40 CFR 60.48b(f)] When nitrogen oxides emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks and zero and span adjustments, obtain emission data by using standby monitoring systems, 40 CFR 60, Appendix A, Method 7, Method 7a, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days. Subpart Db. [40 CFR 60.48b(f)]
- 262 [40 CFR 60.48b(g)] Comply with the provisions of 40 CFR 60.48b(b), (c), (d), (e)(2), (e)(3), and (f), or monitor steam generating unit operating conditions and predict nitrogen oxides emission rates as specified in a plan submitted pursuant to 60.49b(c). Subpart Db. [40 CFR 60.48b(g)]
- 263 [40 CFR 60.49b(b)] Submit the performance test data from the initial performance test and the performance evaluation of the CEMS using the applicable performance specifications in 40 CFR 60 Appendix B to DEQ. Subpart Db. [40 CFR 60.49b(b)]
- 264 [40 CFR 60.49b(d)] Fuel rate recordkeeping by electronic or hard copy daily. Record the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for coal, distillate oil, residual oil, natural gas, wood, and municipal-type solid waste for the reporting period. Determine the annual capacity factor on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. Subpart Db. [40 CFR 60.49b(d)]
- 265 [40 CFR 60.49b(g)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records of the information listed in 40 CFR 60.49b(g)(1) through (g)(10) for each steam generating unit operating day, except as provided under 40 CFR 60.49b(p). Subpart Db. [40 CFR 60.49b(g)]
- 266 [40 CFR 60.49b(h)] Submit excess emissions report: Due by the 30th day following the end of each six-month period. Report any excess emissions which occurred during the reporting period. Subpart Db. [40 CFR 60.49b(h)]
- 267 [40 CFR 60.49b(i)] Submit reports containing the nitrogen dioxide emission rate information recorded under 40 CFR 60.49b(g). Subpart Db. [40 CFR 60.49b(i)]
- 268 [LAC 33:III.1101.B] Opacity \leq 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
- 269 [LAC 33:III.1313.C] Which Months: All Year Statistical Basis: None specified
Total suspended particulate \leq 0.6 lb/MMBTU of heat input.
- 270 [LAC 33:III.1513.C] Which Months: All Year Statistical Basis: None specified
Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
- 271 [LAC 33:III.507.H.1.a] Nitrogen oxides: When NOx emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments, obtain emissions data by using a DEQ-approved monitoring plan per 40 CFR 60.49b(c) to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.

EQT 0186 1-06 - Rental Boiler

- 272 [40 CFR 60.44b(k)] Limit boiler operation to an annual capacity factor of 10 percent or less for natural gas. [40 CFR 60.44b(k)]
- 273 [40 CFR 60.49b(b)] Submit the maximum heat input capacity data from the demonstration of the maximum heat input capacity of the affected facility to DEQ. Subpart Db. [40 CFR 60.49b(b)]
- 274 [40 CFR 60.49b(d)(2)] Record and maintain records of the amount of each fuel combusted during each calendar month. [40 CFR 60.49b(d)(2)]

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EQT 0186 1-06 - Rental Boiler

- 275 [40 CFR 60.49b(p)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records of the calendar date, the number of hours of operation, and the hourly steam load for each steam generating unit operating day. Subpart Db. [40 CFR 60.49b(p)]
- 276 [40 CFR 60.49b(q)] Submit a report to DEQ containing the annual capacity factor over the previous 12 months, the average fuel nitrogen content during the reporting period if residual oil was fired, and all other applicable information per 40 CFR 60.49b(q)(1) through (q)(3). Subpart Db. [40 CFR 60.49b(q)]
- 277 [40 CFR 60.49b] Report information specified in 40 CFR 60.49b(d); (o); (p); (q) and (w). Semi-annual reporting.
- 278 [LAC 33:III.1101.B] Opacity \leq 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
- 279 [LAC 33:III.1313.C] Which Months: All Year Statistical Basis: None specified
Total suspended particulate \leq 0.6 lb/MMBTU of heat input.
- 280 [LAC 33:III.1513.C] Which Months: All Year Statistical Basis: None specified
Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

EQT 0291 M10 - Diesel Fire-Water Pump

- 281 [40 CFR 63.6603(a)] Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. Subpart ZZZZ. [40 CFR 63.6603(a), 40 CFR 63.6625(h)]
- 282 [40 CFR 63.6603(a)] Change oil and filter every 500 hours of operation or annually, whichever comes first. Subpart ZZZZ. [40 CFR 63.6603(a)]
- 283 [40 CFR 63.6603(a)] Equipment/operational data monitored by visual inspection/determination annually or every 500 hours of operation, whichever comes first. Inspect all hoses and belts, and replace as necessary. Subpart ZZZZ. [40 CFR 63.6603(a)]
- 284 [40 CFR 63.6603(a)] Which Months: All Year Statistical Basis: None specified
Equipment/operational data monitored by visual inspection/determination annually or every 1,000 hours of operation, whichever comes first. Inspect air cleaner. Subpart ZZZZ. [40 CFR 63.6603(a)]
- 285 [40 CFR 63.6605(a)] Which Months: All Year Statistical Basis: None specified
Be in compliance with emission limitations and operating limitations in 40 CFR 63 Subpart ZZZZ at all times. Subpart ZZZZ. [40 CFR 63.6605(a)]
- 286 [40 CFR 63.6605(b)] Operate and maintain at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6605(b)]
- 287 [40 CFR 63.6625(e)] Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6625(e)]
- 288 [40 CFR 63.6625(f)] Install a non-resettable hour meter. Subpart ZZZZ. [40 CFR 63.6625(f)]
- 289 [40 CFR 63.6640(a)] Demonstrate continuous compliance with each applicable emission limitation and operating limitation in 40 CFR 63 Subpart ZZZZ Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d according to methods specified in 40 CFR 63 Subpart ZZZZ Table 6. Subpart ZZZZ. [40 CFR 63.6640(a)]

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EQT 0291 M10 - Diesel Fire-Water Pump

- 290 [40 CFR 63.6640(f)(1)ii] Operate for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Limit maintenance checks and readiness testing to 100 hours per year. Subpart ZZZZ. [40 CFR 63.6640(f)(1)ii]
- 291 [40 CFR 63.6640(f)(1)iii] Operate up to 50 hours per year in non-emergency situations, but count those 50 hours towards the 100 hours per year provided for maintenance and testing. Do not use the 50 hours per year for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that the emergency engine may be operated for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. Do not operate for more than 30 minutes prior to the time when the emergency condition is expected to occur, and terminate the engine operation immediately after the facility is notified that the emergency condition is no longer imminent. Count the 15 hours per year of demand response operation as part of the 50 hours of operation per year provided for non-emergency situations. Subpart ZZZZ. [40 CFR 63.6640(f)(1)iii]
- 292 [40 CFR 63.6655] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.6655(a) through (f), as applicable. Subpart ZZZZ.
- 293 [40 CFR 63.Subpart ZZZZ] The 40 CFR 63 Subpart ZZZZ requirements listed for this engine become effective on May 3, 2013.
- 294 [LAC 33:III.1101.B] Opacity \leq 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified
- 295 [LAC 33:III.1311.C] Opacity \leq 20 percent, except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: Six-minute average

GRP 0002 SAU - SULFURIC ACID UNITS 1 & 2

Group Members: RLP 0013 RLP 0014

- 296 [LAC 33:III.509.R.6.a] Before beginning actual construction of the project, permittee shall document and maintain a record of the following information: 1) a description of the project; 2) the emissions units whose emissions of a regulated pollutant could be affected by the project; and 3) a description of the applicability test used to determine that the project is not a major modification for any regulated pollutant, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded from the projected actual emissions (the demand growth exclusion) and an explanation for why such amount was excluded, and any netting calculations, if applicable.
- 297 [LAC 33:III.509.R.6.c] After the first unit is debottlenecked, the permittee shall monitor the Sulfuric Acid Mist emissions that are emitted by this emission source (Unit 1 + Unit 2) which could increase as a result of the project and calculate and maintain a record of the annual emissions, in TPY on a 12-month rolling average basis, for a period of 10 years following resumption of regular operations after the change. Sulfuric Acid Emissions shall be estimated using actual production and an emission factor derived from biennial stack testing or other method approved by LDEQ Engineering.

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GRP 0002 SAU - SULFURIC ACID UNITS 1 & 2

- 298 [LAC 33:III.509.R.6.e] Permittee shall submit a report to LDEQ within 60 days after the end of the year if annual emissions, in TPY, from the project in question exceed the baseline actual emissions by a "significant" (as defined in LAC 33:III.509.B) amount, and if such emissions differ from the preconstruction projection. This report shall contain the following: 1) the name, address, and telephone number of the major stationary source; 2) the annual emissions; and 3) any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).

GRP 0021 Comb - Combustion (Unit 1, Unit 2, Package Boiler, Rental Boiler)

Group Members: EQT 0153 EQT 0186 RLP 0013 RLP 0014

- 299 [LAC 33:III.509.R.6.a] Before beginning actual construction of the project, permittee shall document and maintain a record of the following information: 1) a description of the project; 2) the emissions units whose emissions of a regulated pollutant could be affected by the project; and 3) a description of the applicability test used to determine that the project is not a major modification for any regulated pollutant, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded from the projected actual emissions (the demand growth exclusion) and an explanation for why such amount was excluded, and any netting calculations, if applicable.
- 300 [LAC 33:III.509.R.6.c] After the first unit is debottlenecked, the permittee shall monitor the NOx emissions that are emitted by this emission source (Unit 1 + Unit 2) which could increase as a result of the project and calculate and maintain a record of the annual emissions, in TPY on a 12-month rolling average basis, for a period of 10 years following resumption of regular operations after the change. Emissions shall be estimated using actual production and the emission factor(s) established in the air permit application, except for debottlenecked units which shall use data collected from NOx CEMs.
- 301 [LAC 33:III.509.R.6.c] After the first unit is debottlenecked, the permittee shall monitor the PM10 emissions that are emitted by this emission source (Unit 1 + Unit 2) which could increase as a result of the project and calculate and maintain a record of the annual emissions, in TPY on a 12-month rolling average basis, for a period of 10 years following resumption of regular operations after the change. Emissions shall be estimated using actual production and an emission factor derived from biennial stack testing or other method approved by LDEQ Engineering.
- 302 [LAC 33:III.509.R.6.e] Permittee shall submit a report to LDEQ within 60 days after the end of the year if annual emissions, in TPY, from the project in question exceed the baseline actual emissions by a "significant" (as defined in LAC 33:III.509.B) amount, and if such emissions differ from the preconstruction projection. This report shall contain the following: 1) the name, address, and telephone number of the major stationary source; 2) the annual emissions; and 3) any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).

UNF 0002 UNF02 - Facility Wide

- 303 [40 CFR 60.] All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.
- 304 [40 CFR 61.145(b)(1)] Provide DEQ with written notice of intention to demolish or renovate prior to performing activities to which 40 CFR 61 Subpart M applies. Delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery is acceptable. Subpart M. [40 CFR 61.145(b)(1)]

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UNF 0002 UNF02 - Facility Wide

- 305 [40 CFR 61.148] Do not install or reinstall on a facility component any insulating materials that contain commercial asbestos if the materials are either molded and friable or wet-applied and friable after drying. Subpart M.
- 306 [40 CFR 61.355] Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.
- 307 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Rhodia maintains records for five years as required by Title V. Subpart FF.
- 308 [40 CFR 61.357(d)(2)] Submit report: Due annually, beginning on the date that equipment necessary to comply with 40 CFR 61 Subpart FF has been certified in accordance with 40 CFR 61.357(d)(1). Submit updates to the information listed in 40 CFR 61.357(a)(1) through (a)(3) or, if the information in 40 CFR 61.357(a)(1) through (3) is not changed in the following year, a statement to that effect. Subpart FF. [40 CFR 61.357(d)(2)]
- 309 [40 CFR 61.] All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart A.
- 310 [40 CFR 63.1(b)(3)] An owner or operator of a stationary source who is in the relevant source category and who determines that the source is not subject to a relevant standard or other requirement established under 40 CFR 63 Subpart A must keep a record as specified in 63.10(b)(3). [40 CFR 63.1(b)(3)]
- 311 [40 CFR 63.1095(a)(1)iii] Keep a record of each shipment of continuous butadiene waste streams. Subpart XX. [40 CFR 63.1095(a)(1)iii]
- 312 [40 CFR 63.1095(a)(1)] Route the continuous butadiene stream to a treatment process or wastewater treatment system used to treat benzene waste streams that complies with the standards specified in 40 CFR 61.348. Subpart XX. [40 CFR 63.1095(a)(1)]
- 313 [40 CFR 63.1095(a)(1)] Comply with the requirements of 40 CFR 61 Subpart FF, with the changes in 40 CFR 63 Subpart XX Table 2 and 40 CFR 63.1095(a)(1)(i) through (a)(1)(v). Subpart XX. [40 CFR 63.1095(a)(1)]
- 314 [40 CFR 63.1095(a)(1)] Include list of continuous butadiene waste streams in annual benzene NESHAP report and note whether or not streams were controlled. 40 CFR 63.1095(a)(1)(iv) & (v). Subpart XX. [40 CFR 63.1095(a)(1)]
- 315 [40 CFR 63.1095(a)(3)] Comply with the requirements of 40 CFR 63.1095 at all times except during periods of startup, shutdown, and malfunction, if the startup, shutdown, or malfunction precludes the ability of the affected source to comply with the requirements of 40 CFR 63.1095 and the provisions for periods of startup, shutdown, and malfunction, as specified in 40 CFR 63.1111, are followed. Subpart XX. [40 CFR 63.1095(a)(3)]
- 316 [40 CFR 63.1096(b)] Submit to EPA a written certification that affected waste streams will be managed and treated per the applicable sections in 40 CFR 63 Subpart XX. Not required unless/until written notice is received from generator of subject stream(s). Waste streams regulated under Subpart XX are to be treated and managed per 40 CFR Part 61 Subpart FF, National Emission Standards for Benzene Waste Operations. Rhodia's Baton Rouge site is already in compliance with Subpart FF and will manage XX-regulated waste streams in the same manner as for FF-regulated waste streams. Specifically, the XX-regulated waste streams will be burned as fuel in Unit No. 1 or Unit No. 2. Subpart XX. [40 CFR 63.1096(b)]
- 317 [40 CFR 63.1256(a)(5)(ii)(A)] Submit to EPA a written certification that affected wastewaters and/or wastewater residuals will be managed and treated per the applicable sections in 40 CFR 63.1256(b) - (i). Not required unless/until written notice is received from generator of subject stream(s). Affected wastewater streams and/or residuals will be direct burned (i.e., bypassing storage) in the Unit No. 1 or Unit No. 2 furnace. [40 CFR 63.1256(a)(5)(ii)(A)]
- 318 [40 CFR 63.1256(b)] Comply with 40 CFR 63.1256(b) for each wastewater tank that receives, manages, or treats affected wastewater or its residual. Only Tanks 30D290 and 30D300 will be used for Subpart GGG regulated streams. [40 CFR 63.1256(b)]

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UNF 0002 UNF02 - Facility Wide

- 319 [40 CFR 63.1256(d)(1)(iii)] For containers (trucks/railcars), the cover and all openings will be maintained in a closed position at all times that affected material is in the container except when necessary to use the opening for removal, inspection, sampling, or pressure relief events related to safety considerations. [40 CFR 63.1256(d)(1)(iii)]
- 320 [40 CFR 63.1256(g)(13)ii] Discharge affected streams to a boiler burning hazardous waste for which a final permit has been issued under 40 CFR Part 270 and that complies with the requirements of 40 CFR Part 266 Subpart H. The regeneration furnaces are regulated under RCRA as industrial furnaces and are defined as boilers in 40 CFR 1251. Per 1256(g)(13), RCRA units are exempt from the design evaluation or performance test requirements and from the monitoring requirements in 1256(a)(2)(iii) as well as recordkeeping and reporting requirements associated with monitoring and performance tests. [40 CFR 63.1256(g)(13)ii]
- 321 [40 CFR 63.132(g)(2)] Submit to EPA a written certification, signed by responsible official, that Group 1 wastewaters and/or wastewater residuals will be managed and treated per the applicable sections in 40 CFR 63.133 - 63.147. Not required unless/until written notice is received from generator of subject stream(s). [40 CFR 63.132(g)(2)]
- 322 [40 CFR 63.132(g)] Rhodia will comply with the provisions for off-site treatment of Group 1 HON wastewater or wastewater residuals in accordance with 40 CFR 63.132(g) if/when applicable. Subpart G. [40 CFR 63.132(g)]
- 323 [40 CFR 63.147] Maintain records as required by 40 CFR 63.147. This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to Rhodia. Subpart G.
- 324 [40 CFR 63.152(b)] Submit a Notification of Compliance Status (NCS) report within 150 days of the compliance date. As the treatment facility, the compliance date is the date upon which notice is first received that a HON Group 1 wastewater or wastewater residual has been received onsite. [40 CFR 63.152(b)]
- 325 [40 CFR 63.152(c)] Submit Periodic Reports: Due semiannually no later than 60 calendar days after the end of each 6-month period, except as specified in 40 CFR 63.152(c)(5) and (c)(6). Submit the first report no later than 8 months after the date the Notification of Compliance Status is due. Include the information specified in 40 CFR 63.152(c)(2) through (c)(4). Subpart G. [40 CFR 63.152(c)]
- 326 [40 CFR 63.152(f)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records as specified in 40 CFR 63.152(f)(1) through (f)(7). Subpart G. [40 CFR 63.152(f)]
- 327 [40 CFR 68.150] Submit Risk Management Plan (RMP): Due no later than June 21, 1999, or three years after the date on which a regulated substance is first listed under 68.130, or the date on which a regulated substance is first present above a threshold quantity in a process. Submit in a method and format to a central point as specified by EPA prior to June 21, 1999.
- 328 [40 CFR 68.155] Provide in the RMP an executive summary that includes a brief description of the elements listed in 68.155(a) through (g).
- 329 [40 CFR 68.160] Complete a single registration form and include in the RMP. Cover all regulated substances handled in covered processes. Include in the registration the information specified in 68.160(b)(1) through (13).
- 330 [40 CFR 68.165] Submit in the RMP information the release scenarios specified in 68.165(a)(2). Include the data listed in 68.165(b)(1) through (13).
- 331 [40 CFR 68.180] Provide in the RMP the emergency response information listed in 68.180(a) through (c).
- 332 [40 CFR 68.190(c)] Submit revised registration to EPA: Due within six months after a stationary source is no longer subject to 40 CFR 68. Indicate that the stationary source is no longer covered. [40 CFR 68.190(c)]
- 333 [40 CFR 68.190] Review and update the RMP as specified in 68.190(b) and submit it in a method and format to a central point specified by EPA prior to June 21, 1999.

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UNF 0002 UNF02 - Facility Wide

- 334 [40 CFR 68.200] Maintain records supporting the implementation of 40 CFR 68 for five years unless otherwise provided.
- 335 [40 CFR 68.22] Use the endpoints specified in 68.22(a) through (g) for analyses of offsite consequences.
- 336 [40 CFR 68.25] Analyze the release scenarios in 68.25, as specified in 68.25(a) through (h).
- 337 [40 CFR 68.30] Estimate in the RMP the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
- 338 [40 CFR 68.33] List in the RMP environmental receptors within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
- 339 [40 CFR 68.36(b)] Submit revised RMP: Due within six months after changes in processes, quantities stored or handled, or any other aspect of the stationary source increase or decrease the distance to the endpoint by a factor of two or more. [40 CFR 68.36(b)]
- 340 [40 CFR 68.36] Review and update the offsite consequence analyses at least once every five years. Complete a revised analysis within six months if changes in processes, quantities stored or handled, or any other aspect of the stationary source might reasonably be expected to increase or decrease the distance to the endpoint by a factor of two or more.
- 341 [40 CFR 68.39] Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain the records specified in 68.39(a) through (e) on the offsite consequence analyses.
- 342 [40 CFR 68.42] Include in the five-year accident history all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage. Include the information specified in 68.42(b)(1) through (10) for each accidental release.
- 343 [LAC 33:III.1103] Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited.
- 344 [LAC 33:III.1109.B] Outdoor burning of waste material or other combustible material is prohibited.
- 345 [LAC 33:III.1303.B] Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
- 346 [LAC 33:III.2113.A] Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
- 347 [LAC 33:III.219] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- 348 [LAC 33:III.2901.D] Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
- 349 [LAC 33:III.2901.F] If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.
- 350 [LAC 33:III.5105.A.1] Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard.

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UNF 0002 UNF02 - Facility Wide

- 351 [LAC 33:III.5105.A.2] Do not cause a violation of any ambient air standard listed in LAC 33:III. Table 51.2, unless operating in accordance with LAC 33:III.5109.
- 352 [LAC 33:III.5105.A.3] Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
- 353 [LAC 33:III.5105.A.4] Do not fail to keep records, notify, report or revise reports as required under LAC 33:III. Chapter 51. Subchapter A.
- 354 [LAC 33:III.5107.A.2] Include a certification statement with the annual emission report and revisions to any emission report that attests that the information contained in the emission report is true, accurate, and complete, and that is signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official.
- 355 [LAC 33:III.5107.A] Submit Annual Emissions Report: Due annually, by the 30th of April unless otherwise directed by DEQ, to the Office of Environmental Services in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.
- 356 [LAC 33:III.5107.B.1] Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but in no case later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere that results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).
- 357 [LAC 33:III.5107.B.2] Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:I.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:I.3923.
- 358 [LAC 33:III.5107.B.3] Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:I.3931. Submit notification in the manner provided in LAC 33:I.3923.
- 359 [LAC 33:III.5107.B.4] Submit written report: Due by certified mail to SPOC within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through B.3. Include the information specified in LAC 33:III.5107.B.4.a.i through B.4.a.viii.
- 360 [LAC 33:III.5107.B.5] Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, IF THEY CAN BE MEASURED AND CAN BE RELIABLY QUANTIFIED USING GOOD ENGINEERING PRACTICES, to DEQ along with the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
- 361 [LAC 33:III.5109.C] Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III. Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by DEQ.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

UNF 0002 UNF02 - Facility Wide

- 362 [LAC 33:III.5113.A.1] Submit notification in writing: Due to SPOC not more than 60 days nor less than 30 days prior to initial start-up. Submit the anticipated date of the initial start-up.
- 363 [LAC 33:III.5113.A.2] Submit notification in writing: Due to SPOC within 10 working days after the actual date of initial start-up of the source. Submit the actual date of initial start-up of the source.
- 364 [LAC 33:III.5113.B.1] Ensure that all testing done to determine the emission of toxic air pollutants is conducted by qualified personnel.
- 365 [LAC 33:III.5113.B.1] Submit test results: Due in writing to the Office of Environmental Services within 60 days after completion of the test. Submit test results signed by the person responsible for the test.
- 366 [LAC 33:III.5113.B.1] Submit notification of testing: Due to the Office of Environmental Services at least 30 days prior to testing.
- 367 [LAC 33:III.5113.B.2] Conduct emission tests as set forth in accordance with Test Methods of 40 CFR, parts 60, 61, and 63 or in accordance with alternative test methods approved by DEQ.
- 368 [LAC 33:III.5113.B.3] Provide necessary sampling and testing facilities, exclusive of instruments and sensing devices, as needed to properly determine the emission of toxic air pollutants.
- 369 [LAC 33:III.5113.B.4] Provide emission testing facilities as specified in LAC 33:III.5113.B.4.a through B.4.e.
- 370 [LAC 33:III.5113.B.5] Submit certified letter: Due to the Office of Environmental Services before the close of business on the sixtieth day following the completion of the emission test. Report the determinations of the emission test.
- 371 [LAC 33:III.5113.B.5] Analyze samples and determine emissions within 30 days after each emission test has been completed.
- 372 [LAC 33:III.5113.B.6] Retain records of emission test results and other data needed to determine emissions. Retained records at the source, or at an alternate location approved by DEQ for a minimum of two years, and make available upon request for inspection by DEQ.
- 373 [LAC 33:III.5113.B.7] Submit notification: Due to the Office of Environmental Services at least 30 days before the emission test. Submit notification of emission test to allow DEQ the opportunity to have an observer present during the test.
- 374 [LAC 33:III.5113.C.1] Maintain and operate each monitoring system in a manner consistent with good air pollution control practices for minimizing emissions. Repair or adjust any breakdown or malfunction of the monitoring system as soon as practicable after its occurrence.
- 375 [LAC 33:III.5113.C.5.d] Install all continuous monitoring systems or monitoring devices to make representative measurements under variable process or operating parameters.
- 376 [LAC 33:III.5113.C.5.e] Collect and reduce all data as specified in LAC 33:III.5113.C.5.e.i and ii.
- 377 [LAC 33:III.5113.C.7] Maintain records of monitoring data, monitoring system calibration checks, and the occurrence and duration of any period during which the monitoring system is malfunctioning or inoperative. Maintain these records at the source, or at an alternative location approved by DEQ, for a minimum of three years and make available, upon request, for inspection by DEQ.
- 378 [LAC 33:III.5151.F.1.f] An individual or company contracted to perform a demolition or renovation activity which disturbs RACM must be recognized by the Licensing Board for Contractors to perform asbestos abatement, and shall meet the requirements of LAC 33:III.5151.F.2 and F.3 for each demolition or renovation activity.
- 379 [LAC 33:III.535] Permittee shall comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and the Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC 33:III.537]. [LAC 33:III.535, LAC 33:III.537]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120011

Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

UNF 0002 UNF02 - Facility Wide

- 380 [LAC 33:III.5611.A] Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by the administrative authority.
- 381 [LAC 33:III.5611.B] During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.
- 382 [LAC 33:III.5901.A] Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.
- 383 [LAC 33:III.5907] Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur.
- 384 [LAC 33:III.5911.C] Submit amended registration: Due to the Office of Environmental Compliance within 60 days after the information in the submitted registration is no longer accurate.
- 385 [LAC 33:III.919.F] Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 30th of April for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Services. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-G.
- 386 [LAC 33:III.927] Report the unauthorized discharge of any air pollutant into the atmosphere in accordance with LAC 33:I.Chapter 39, Notification Regulations and Procedures for Unauthorized Discharges. Submit written reports to the department pursuant to LAC 33:I.3925. Submit timely and appropriate follow-up reports detailing methods and procedures to be used to prevent similar atmospheric releases.

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No. 7005 0390 0006 1029 1380

Activity No.: PER20110006
Agency Interest No. 1314

Mr. Daniel Tate
Plant Manager
Rhodia, Inc.
P.O. Box 828
Baton Rouge, La 70821

RE: Part 70 Operating Permit Modification
Rhodia, Inc. - Sulfuric Acid Plant - Baton Rouge Facility
Baton Rouge, East Baton Rouge Parish, Louisiana

Dear Mr. Tate:

This is to inform you that the permit modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the 11th of May, 2016, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this 15 day of March, 2012.

Permit No.: 0840-00033-V4

Sincerely,

A handwritten signature in cursive script, appearing to read "S. L. Phillips".

Sam L. Phillips
Assistant Secretary
SLP: EMC
c: EPA Region VI

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AIR PLANNING SEC.
12 MAR 26 PM 3:55

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AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Sulfuric Acid Plant - Baton Rouge Facility
Agency Interest No.: 1314
Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana

I. Background

Rhodia Inc. (Rhodia) operates a Sulfuric Acid Plant located in Baton Rouge, East Baton Rouge Parish, Louisiana. The facility produces sulfuric acid by using two sulfuric acid production trains (Unit No. 1 and Unit No. 2). Unit No. 1 was constructed in 1953 and unit No. 2 was constructed in 1968. Previously the facility operated under Title V Permit 0840-00032-V0 dated October 12, 2005, Title V General Permit No. 3032-V1 issued December 13, 2006, and Title V Permit 0840-00032-V2 issued November 30, 2009. Currently the facility operates under a consolidated Title V Permit 0840-00032-V3 dated May 11, 2011.

Rhodia has entered into a Consent Decree (Civil Action No. 2:07CV134 WL) with the United States and various State parties including Louisiana, effective July 23, 2007. This Consent Decree requires Rhodia to install controls for SO₂ emissions at their various plant sites nation wide. The requirements for the Baton Rouge Facility have been incorporated into this permit.

II. Origin

An air permit application and Emission Inventory Questionnaire (EIQs) were submitted by Rhodia, Inc. on December 15, 2011 requesting a Part 70 operating permit modification.

III. Description

Sulfuric Acid Plant

Rhodia receives spent sulfuric acid and hazardous waste fuels from off-site sources and recovers the sulfur and energy values in its industrial furnaces, forming fresh sulfuric acid. The sulfuric acid production process begins with treatment of the feed streams in the industrial furnace. Liquids are sprayed using atomizers into the combustion chamber. Normal operating conditions are 2% to 4% excess furnace oxygen and furnace temperature between 1800°F and 2200°F at the furnace discharge. Furnace residence time is approximately three seconds. The feed streams are producing steam for process use. Gas from the waste heat boiler is further cooled and cleaned in the gas scrubbing system. This system includes spray scrubbing and wet electrostatic precipitators to remove acid mist and particulate emissions.

Cooling systems reduce the gas temperature from 600°F to 100°F. The wet gas is then dried through counter-current packed flow columns circulating ≥93% sulfuric acid. Dry gas is heated to 800°F before the sulfur dioxide is converted to sulfur trioxide using catalyst.

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Because the conversion step to sulfur trioxide is exothermic, the hot exhaust gas is used to heat up the incoming feed by cross-current heat exchange.

Sulfur trioxide from the converter enters a countercurrent packed absorption tower. Strong sulfuric acid absorbs and hydrolyzes the sulfur trioxide to sulfuric acid. The demisters are the final pollution control device, removing primarily sulfuric acid mist generated in the acid tower. The demisters also control HCl and particulate emissions.

The preceding process description pertains to Unit No. 1. The Unit No. 2 process is slightly different. After the drying step, the gas enters a second sulfur burning furnace, followed by a hot gas filter. This added step heats the gas, affording a second occasion for combustion. Unit No. 2 has over twice the capacity of Unit No. 1. Equipment is sized proportionately, with Unit No. 2 having a longer residence time.

Waste Storage

Seven tanks have been constructed specifically for the storage of hazardous waste. These seven tanks are located in the truck and rail unloading facility and operate under a nitrogen pad. A positive pressure vent system is tied into Unit No. 2 or to the TS Vapor Combustor to burn all fumes and vapors.

Package Boiler

The package boiler provides backup and supplemental steam production to Units No. 1 and No. 2. It is rated for 80,000 lbs/hr steam production with a heat input of 106 MM BTU/hr and is permitted for an annual average heat input of 50 MM BTU/hr. It is fired with natural gas only and is equipped with low-NOx burners and a continuous flue gas oxygen analyzer.

Rental Boiler

The rental boiler provides backup steam production to Units No. 1 and No. 2 and the package boiler. It is fired with natural gas only and has a maximum firing rate of 133 MM BTU/hr but is limited to a calendar average firing rate of 12.4 MM BTU/hr per 40 CFR 60.44b(j)(2).

SO₂ Abatement Scrubbers and Debottlenecking Project

As part of Rhodia's consent decree for the Baton Rouge facility, Rhodia will install packed bed scrubbers on Sulfuric Acid Unit No. 1 and Unit No. 2 to control SO₂ emissions, which will be reduced by more than 10,000 TPY by the completion of Phase III of the project. Also

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as part of the consent decree, the Environmental Protection Agency (EPA) agreed to allow the Sulfuric Acid Plant to undergo an expansion project. This project will allow the facility to increase its total Sulfuric Acid (H_2SO_4) production from 2,200 tons/day to 2,800 tons/day. Specifically, the capacity of Sulfuric Acid Unit No.1 (EPN 3) will increase from 700 tons/day to 900 tons/day of sulfuric acid, and the capacity of Sulfuric Acid Unit No. 2 (EPN 2) will increase from 1,500 tons/day to 1,900 tons/day. The capacity increase will be accomplished with a series of debottlenecking projects.

Rhodia is requesting the following changes with this permit modification.

1. Reconcile emissions of HCl and Cl_2 from the Unit 1 (RLP 0014) and Unit 2 (RLP 0013) Sulfuric Acid Regeneration Unit (SARU) stacks based on recent stack test data and conservative assumptions.
2. Reconcile VOC emissions from the Unit 1 and Unit 2 SARUs to use a lbs/ton emission factor calculated from stack test data instead of using the straight lbs/hr stack test results. The annual emissions for Units 1 and 2 are part of emission caps, RLP 0014, RLP 0013, CAP-Comb, and CAP-SAU emissions will be affected.
3. Include (ABCO) Boiler (EQT 0153) emissions in emission cap "CAP-Comb" to better reflect function as supplemental/backup stream to the Unit 1 and Unit 2 SARUs.
4. Reconcile emissions for the Treatment Services Vapor Combustor (TSVC, EQT 0147) and Acid Plant Vapor Combustor (APVC, EQT 0151).
5. Update General Conditions XVII Activities and Insignificant Activities.
6. Update RLP 0013 and RLP 0014 stack parameters using more recent design data.
7. Update the Specific Requirement No. 12 because the permits (7777-00314-01 and 7777-00413-00 which were referred by the requirement) have been rescinded, thus if a substitute scrubber is used, it will simply comply with the same requirements as the primary unit.
8. Delete LAC 33:III.1101.B requirements from equipment which use natural gas as fuel.

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	58.16*	58.43*	+0.27
SO ₂ (Phase II)	4726.08	4726.23	+0.15
SO ₂ (Phase III)	1077.89	1078.06	+0.17
NO _x	117.13	118.64	+1.51

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Pollutant	Before	After	Change
CO	95.76	103.81	+8.05
VOC	26.55	29.60	+3.05
HAPs ¹	8.92	9.18	+0.26

^{*}Includes sulfuric acid mist

Phase II is effective from January 1, 2011 through April 30, 2012.

Phase III becomes effective on May 1, 2012.

¹Facility wide CAP for total HAPs (VOC + non-VOC).

For a list of HAP and its respective emission rates in tons per year see the TPOR0146 report – Emission Rates For TAP/HAP & Other Pollutants.

For HAPs speciation see Table A.

LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
2,6-Dinitrotoluene	0.04	0.04	-
Ammonia	0.56	0.56	-
Barium (and compounds)	0.18	0.18	-
Chlorine dioxide	0.01	0.01	-
Copper (and compounds)	0.11	0.11	-
Diaminotoluene (mixed isomers)	0.12	0.12	-
Hydrogen sulfide	0.49	0.49	-
Nitric acid	0.14	0.14	-
Pyridine	0.56	0.56	-
Sulfuric acid	42.36	42.38	+0.02
Toluene-2,6-Diisocyanate	0.01	0.01	-
Zinc (and compounds)	0.22	0.22	-
n-butyl alcohol	1.00	1.00	-
Total TAPs	45.80	45.82	+0.02

Table A

Pollutant Type	Pollutant		
VOC	1,1,2,2-Tetrachloroethane	Captan	Methyl bromide
	1,1,2-Trichloroethane	Carbaryl	Methyl chloride
	1,1-Dichloroethane	Carbon disulfide	Methyl ethyl ketone

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1,1-Dimethylhydrazine	Carbon tetrachloride	Methyl isobutyl ketone
1,2,4-Trichlorobenzene	Carbonyl sulfide	Methyl methacrylate
1,2-Dibromo-3-chloropropane	Chlordane	Methylene diphenyl diisocyanate
1,2-Dibromoethane	Chloroacetic acid	Monomethyl hydrazine
1,2-Dichloroethane	Chlorobenzene	N,N-Diethyl aniline
1,2-Dichloropropane	Chloroethane	N,N-dimethylbenzenamine
1,2-Diphenylhydrazine	Chloroform	N-Nitroso-N-Methylurea
1,2-Epoxybutane	Chloromethyl methyl ether	N-Nitrosodimethylamine
1,2-Epoxyethylbenzene	Chloroprene	N-Nitrosomorpholine
1,2-Oxathiolane 2,2-dioxide	Chromium VI (and compounds)	Naphthalene
1,3-Butadiene	Cobalt compounds	Nickel (and compounds)
1,3-Dichloropropene	Cresol	Nitrobenzene
1,4-Dichlorobenzene	Cumene	Parathion
1,4-Dioxane	Cyanide compounds	Pentachloronitrobenzene
2,2'-dichlorodiethylether	Diazomethane	Phenol
2,2,4-Trimethylpentane	Dibutyl phthalate	Phosgene
2,4,5-Trichlorophenol	Dichlorvos	Phosphorus, Total (as P)
2,4,6-Trichlorophenol	Diethanolamine	Phthalic Anhydride
2,4-Dichlorophenoxyacetic Acid	Diethyl Sulfate	Polychlorinated biphenyls
2,4-Dinitrophenol	Dimethyl formamide	PAH
2,4-Dinitrotoluene	Dimethyl phthalate	Propionaldehyde
2,4-Toluene diamine	Dimethyl sulfate	Propoxur
2-Acetylaminofluorene	Dimethylcarbamoyl chloride	Propylene
2-nitro-Propane	Epichlorohydrin	Propylene oxide
3,3'-Dichlorobenzidine	Ethyl 4,4'-Dichlorobenzilate	Propylenimine
4,4'-Methylenebis-(2-Chloroaniline)	Ethyl Acrylate	Pyrocatechol
4,4'-Methylenebisbenzenamine	Ethyl benzene	Quinoline
4,6 Dinitro-o-cresol	Ethylene	Quinone
4-Aminodiphenyl	Ethylene glycol	Selenium (and compounds)
4-Dimethylaminoazobenzene	Ethylene oxide	Styrene
4-Nitrobiphenyl	Ethyleneimine	Toluene
4-Nitrophenol	Ethylenethiourea	Toluene-2,4-diisocyanate
Acetaldehyde	Formaldehyde	Toxaphene
Acetamide	Glycol ethers (Table 51.1)	Trichloroethylene
Acetonitrile	Glycol ethers (Table 51.3)	Triethyl amine
Acetophenone	Heptachlor	Trifluralin
Acrolein	Hexachlorobenzene	Urethane
Acrylamide	Hexachlorobutadiene	Vinyl acetate
Acrylic acid	Hexachlorocyclopentadiene	Vinyl bromide
Acrylonitrile	Hexachloroethane	Vinyl chloride
Allyl chloride	Hexamethylene diisocyanate	Vinylidene chloride

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	Amiben	Hexamethylphosphoramide	Xylene (mixed isomers)
	Aniline	Hydrazine	alpha-Chloroacetophenone
	Antimony (and compounds)	Hydrogen cyanide	beta-Propiolactone
	Arsenic (and compounds)	Hydroquinone	bis(2-ethylhexyl)phthalate
	Benzene	Iodomethane	bis(Chloromethyl)ether
	Benzidine	Isophorone	n-Hexane
	Benzotrichloride	Lindane	o-Aminoanisole
	Benzyl chloride	Maleic anhydride	o-dianisidine
	Beryllium (Table 51.1)	Manganese (and compounds)	ortho-Tolidine
	Biphenyl	Mercury (and compounds)	ortho-Toluidine
	Bromoform	Methanol	p,p'-DDE
	Butene (mixed isomers)	Methoxychlor	para-Phenylenediamine
	Cadmium (and compounds)	Methyl Isocyanate	pentachloro-Phenol
	Calcium cyanamide	Methyl Tertiary Butyl Ether	
Non-VOC	1,1,1-Trichloroethane	Hydrochloric acid	Tetrachloroethylene
	Chlorine	Hydrofluoric acid	Titanium tetrachloride
	Dichloromethane	Phosphine	

IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations. Prevention of Significant Deterioration (PSD), New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) do not apply.

This facility is a major source of criteria pollutants. The facility is also a major source of Toxic Air Pollutants (TAPs) under LAC 33:III.Chapter 51. The facility is not a major source of Hazardous Air pollutants (HAPs); however, wastewater and wastewater residuals from facilities subject to 40 CFR 63 Subpart G and other MACT standards or NSPS may be treated at the facility. Therefore, the Sulfuric Acid Plant complies with any applicable provisions of these MACT/NSPS standards.

Permit Shield

Per 40 CFR 70.6(f) and LAC 33:III.507.I, a permit shield has been determined for the referenced facility as follows:

1. Per 40 CFR 60.8(c), emissions in excess of a standard are not in violation during startup, shutdown, or malfunction events. Further, per 40 CFR 60.11(c), the opacity

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standards do not apply during periods of startup, shutdown, and malfunction. Rhodia's Consent Decree defines startup as, "the 24-hour period at any sulfuric acid plant beginning when the feed of sulfur or sulfur-bearing materials, excluding conventional fossil fuels such as natural gas or fuel oils, to the furnace commences after a main gas blower shutdown" but there is no such definition in 40 CFR 60 Subpart H. Therefore, Rhodia has requested a permit shield to use the Consent Decree definition of "startup" for determining compliance with the 40 CFR 60 Subpart H 10% opacity limit and the 0.15 lbs/ton limit.

2. The Unit No. 1 and Unit No. 2 furnaces are treatment processes for certain waste streams regulated under 40 CFR 61 Subpart FF (Benzene Waste NESHAP). Per 40 CFR 61.348(e) certain requirements apply if the treatment process has any openings (e.g., access doors, hatches, etc.)

The furnaces operate at less than atmospheric pressure which is continuously monitored. Annual inspections per 61.348(e)(3)(ii) are conducted. Frequent inspections and repairs are conducted to minimize any cracks and unsealed openings. Very small openings may go undetected and/or not be repaired because the furnaces operate under vacuum. Occasionally, the furnaces may experience a short-term positive pressure when introducing a new feed to the furnace. This issue was reviewed with LDEQ for the recently issued BIF permit. The BIF permit requires that furnace pressure be maintained at -0.1 inches of water maximum, 10-second delay. The 10-second delay is allowed to normalize the pressure before automatically shutting down feeds to the furnace.

Rhodia requested a permit shield that allows compliance with 61.348(e) to be demonstrated by maintaining furnace pressure at -0.1 inches of water maximum, 10-second delay and operating furnace openings with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 61.355(h).

3. For the Treatment Services Fugitive Emissions (EIQ FUG-TS), per the Louisiana Fugitive Emissions Program Consolidation Guidelines, Rhodia follows a streamlined fugitive monitoring program with the Louisiana MACT Determination for Non-HON sources as the most stringent program. Rhodia has reduced site-wide permitted emissions of all class I and II TAPs emitted from source FUG-TS to below their MERs. Thus, LA Non-HON MACT no longer applies. However, Rhodia is voluntarily choosing to continue to comply with the LA Non-HON MACT since the

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program is already in place. Therefore, Rhodia is requesting a permit shield to ensure that complying with LA Non-HON MACT still ensures compliance with the underlying programs that were consolidated (40 CFR 264 Subpart BB and 40 CFR 61 Subpart V).

4. Rhodia requested a permit shield stating that compliance with the NSPS Subpart H acid mist and opacity standards constitutes compliance with the LAC 33:III.Chapter 15 acid mist standard and the LAC 33:III.1311.C opacity standard and that compliance with the SO₂ standard in the permit (long-term and short-term limits which are lower than the Subpart H standard of 4.0 lbs/ton) constitutes compliance with the LAC 33:III.Chapter 15 SO₂ standard. "Standard" in this context includes all monitoring, recordkeeping, reporting, and testing. This permit shield is effective upon permit issuance for Unit 2 for all three pollutants and for Unit 1 for acid mist. It becomes effective for Unit 1 SO₂ and opacity when the more stringent standards become effective on May 1, 2012

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. Public Notice

Public notice is not required for a minor modification to a Part 70 Operating Permit.

VII. Effects on Ambient Air

Emissions associated with the proposed facility were reviewed by the LDEQ Air Permits Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions for this permit modification. However, LDEQ did require

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modeling for the 0840-00033-V2 permit, which the facility submitted on October 6, 2008.
The results are presented below.

Dispersion Model(s) Used: ISCT3

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
Chlorine	8-Hour	26.71 $\mu\text{g}/\text{m}^3$	35.7 $\mu\text{g}/\text{m}^3$
Hydrochloric acid	8-Hour	134.82 $\mu\text{g}/\text{m}^3$	180.0 $\mu\text{g}/\text{m}^3$
Sulfuric acid	8-Hour	22.32 $\mu\text{g}/\text{m}^3$ *	23.8 $\mu\text{g}/\text{m}^3$
MIBK	8-Hour	323.02 $\mu\text{g}/\text{m}^3$	4880 $\mu\text{g}/\text{m}^3$
Dichloromethane	Annual	0.8667 $\mu\text{g}/\text{m}^3$	212.77 $\mu\text{g}/\text{m}^3$
Acrylonitrile	Annual	1.152 $\mu\text{g}/\text{m}^3$	1.47 $\mu\text{g}/\text{m}^3$
1,3-Butadiene	Annual	0.723 $\mu\text{g}/\text{m}^3$	0.92 $\mu\text{g}/\text{m}^3$
Antimony	8-Hour	0.466 $\mu\text{g}/\text{m}^3$	11.90 $\mu\text{g}/\text{m}^3$
Arsenic	Annual	0.00004 $\mu\text{g}/\text{m}^3$	0.02 $\mu\text{g}/\text{m}^3$
Barium	8-Hour	0.884 $\mu\text{g}/\text{m}^3$	11.90 $\mu\text{g}/\text{m}^3$
Chromium VI	Annual	0.00004 $\mu\text{g}/\text{m}^3$	0.01 $\mu\text{g}/\text{m}^3$
Copper	8-Hour	0.40913 $\mu\text{g}/\text{m}^3$	23.80 $\mu\text{g}/\text{m}^3$
Manganese	8-Hour	0.27827 $\mu\text{g}/\text{m}^3$	4.76 $\mu\text{g}/\text{m}^3$
Nickel	Annual	0.00004 $\mu\text{g}/\text{m}^3$	0.21 $\mu\text{g}/\text{m}^3$
Selenium	8-Hour	0.35001 $\mu\text{g}/\text{m}^3$	4.76 $\mu\text{g}/\text{m}^3$
Zinc	8-Hour	0.80561 $\mu\text{g}/\text{m}^3$	119.00 $\mu\text{g}/\text{m}^3$
SO ₂ *	Annual	21.88 $\mu\text{g}/\text{m}^3$	(80 $\mu\text{g}/\text{m}^3$)
	24-Hour	335.04 $\mu\text{g}/\text{m}^3$	(365 $\mu\text{g}/\text{m}^3$)
	3-Hour	1017.57 $\mu\text{g}/\text{m}^3$	(1300 $\mu\text{g}/\text{m}^3$)
*Phase I emissions (worst case)			

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VIII. General Condition XVII Activities

ID No.	Work Activity	Schedule	Emission Rates – tons					Other
			PM ₁₀	SO ₂	NO _x	CO	VOC	
GC1	Catalyst reconditioned in Sulfuric Acid Unit Nos. 1 & 2	Once each 24 months per unit	0.2					
GC2	Drum re-packaging	4 times per year					0.002	
GC3	Vacuum trucks used for tank cleanouts, spill cleanup, and sump clean out	Weekly		0.06			0.06	
GC4	Tank and process equipment cleaning			0.1			0.90	
GC5	Opening of truck and railcars containing waste fuel and spent acid for sampling, inspection, maintenance, or further processing	Daily		0.5			0.01	
GC6	Sampling waste fuel trucks, railcars, and tanks via sample tap	10 times per day					0.03	##
GC7	Sampling spent acid and IFS trucks, railcars, and barges	8 times per day		0.004			0.004	
GC8	Washing inside surface of Unit No. 1 & 2 exhaust stacks	2 times per year			0.25			0.01*
GC9	Odor-neutralizing compounds						0.06	
GC10	Manual gauging of tank levels			0.5			0.1	
GC11	Melting sulfur solidified in piping and other equipment at the old sulfur pit (formerly EIQ 18)			<0.001				<0.001#
GC12	Sampling for moisture content, stack gauging, and pressure readings from gas streams			0.1				0.1*
GC13	Loading fresh acid onto heel of spent acid			0.003			0.004	
GC14	Acid Plant Vapor Combustor (APVC) routine maintenance	240 hours per year (max)					4.62	**
GC15	Unloading containers of spent acid with chlorinated VOCs (carbon bed for VOCs, caustic scrubber if any SO ₂ present)	1 per week		0.1			0.06	**

*Sulfuric Acid Mist

#Hydrogen Sulfide

** VOC Speciation similar to Spent Acid Process permitted emissions

VOC Speciation similar to TS Process permitted emissions

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IX. Insignificant Activities

ID No.	Description	Operating Rate	Regulation
		(Max) or Tank Capacity	
20D962	Diesel Storage Tank, Firewater Pump	300 gal	LAC 33:III.501.B.5.A.3
90D360	Diesel Storage Tank, Maintenance	1000 gal	LAC 33:III.501.B.5.A.3
	Diesel Storage Tank, IFS	1000 gal	LAC 33:III.501.B.5.A.3
91D321	IFS Wash-water Storage Tank	9000 gal	LAC 33:III.501.B.5.A.3
90D210	Laboratory Excess Sample Tank	100 gal	LAC 33:III.501.B.5.A.2
Hoods	Different Analyses*	N/A	LAC 33:III.501.B.5.A.6
	Drum Washing Operations	55 gal	LAC 33:III.501.B.5.A.7
	Temporary (seasonal) Portable Gasoline Tank	550 gals	LAC 33:III.501.B.5.A.8

*Vents associated with exhaust hoods for laboratory equipment used exclusively for routine chemical and physical analysis with the purpose of quality control or environmental monitoring purposes.

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X. Applicable Louisiana and Federal Air Quality Requirements																				
ID No.:	Description	LAC 33:III.Chapter																		
		5[▲]	9	11	13	15	1701	2103	2107	2108	2111	2113	2115	2121	2122	2147	2153	51*	56	59*
UNF002	Facility Wide	1	1	1	1							1						1	1	1
ARE002	M4 – West End Sump																			
ARE003	M3 - Treatment Services Sumps																			
EQT008	30D260 – Spent Acid Tank							2												
EQT140	10 – Preheater; Acid Unit No. 1			1	1	2														
EQT141	11 – Lime Silos				1															
EQT142	12 – Oleum Loading Vent Scrubber	1																1		
EQT146	20 – Sulfur Feed Tank					2														
EQT147	21 – TS Vapor Combustor			1	1	2		1										1		
EQT149	24 – Oleum Barge Loading Scrubber	1																1		
EQT150	26 – Spent Acid Barge Loading Scrubber	1								3			2							
EQT151	27 – Acid Plant Vapor Combustor			1	1	2		2										1		
EQT152	28 – Gasoline Storage Tank							1												
EQT153	6-90 – Package Boiler				1	2														
EQT154	M1a – Unit 2 Cooling Tower				2															
EQT155	M1b – Unit 1 Cooling Tower				2															
EQT285	20D380 – Unit 2 Weak Acid Tank																			
EQT157	30D030 – Oleum Tank																			
EQT158	30D040 – 93/Oleum																			
EQT159	30D050 – 99WW Tank																			
EQT161	30D070 – Spent Acid Tank							2												
EQT163	30D100 – Spent Acid Tank							2												
EQT164	30D110 – Spent Acid Tank							2												
EQT165	30D120 – Spent Acid Tank							2												
EQT166	30D130 – Oleum Tank																			
EQT167	30D140 – 99/Oleum/Spent							2												
EQT168	30D150 – 99/Oleum Spent							2												
EQT169	30D160 – Spent Acid Tank							2												
EQT170	30D180 – 93E Tank																			

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.Chapter																		
		5 [▲]	9	11	13	15	1701	2103	2107	2108	2111	2113	2115	2121	2122	2147	2153	51*	56	59*
EQT171	30D190 – Spent Acid Tank							2												
EQT173	30D210 – 93E Tank																			
EQT174	30D220 – 99WW Tank																			
EQT175	30D230 – 99C Tank																			
EQT176	20D120/30D240 – IFS Mix Tank							1												
EQT177	40D250 – Treatment Services Tank							1												
EQT178	40D280 – Treatment Services Tank							1												
EQT179	40D290 – Treatment Services Tank							1												
EQT180	40D200 – Treatment Services Tank							1												
EQT181	40D210 – Treatment Services Tank							1												
EQT182	40D300 – Treatment Services Tank							1												
EQT183	40D220 – Treatment Services Tank							1												
EQT184	30D103 – Sulfur Unloading Tank																			
EQT185	M7 – 001 Wastewater Treatment Unit																			
EQT186	1-06 – Rental Boiler	1			1	2														
FUG002	FUG-ACID – Acid Plant Fugitive Emissions					2									3			1		
FUG003	FUG-TS – Treatment Services Fugitive Emissions														3			1		
GRP002	CAP-SAU – Sulfuric Acid Units 1 & 2	1																		
GRP021	CAP-Comb - Combustion (Unit 1, Unit 2, Rental Boiler)	1																		
RLP013	2 – Sulfuric Acid Unit No. 2	1			1	1												1		
RLP014	3 – Sulfuric Acid Unit No. 1	1			1	1												1		
PCS001	Spt-Proc - Spent Acid Process																	1		
PCS002	TS-Proc - TS Process																	1		
EQT277	13 – Acid Plant Caustic Scrubber	1	1			1														
EQT278	U1-Scbr – Unit 1 Tail Gas Scrubber		1																	
EQT279	U2-Scbr – Unit 2 Tail Gas Scrubber		1																	
EQT280	U1-Furn – Unit 1 Furnace			1				2										1		
EQT281	U2-RFurn – Unit 2 Regen Furnace			1				1												

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X. Applicable Louisiana and Federal Air Quality Requirements																				
ID No.:	Description	LAC 33:III.Chapter																		
		5 [▲]	9	11	13	15	1701	2103	2107	2108	2111	2113	2115	2121	2122	2147	2153	51*	56	59*
EQT282	U2-SFurn – Unit 2 Sulfur Furnace			1																
EQT283	U1-Proc – Unit 1 Process					1														
EQT284	U2-Proc – Unit 2 Process					1												1		
EQT291	M10 – Diesel Fire-water Pump			1	1															

* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

KEY TO MATRIX

- 1 - The regulations have applicable requirements that apply to this particular emission source.
 - The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
 - 2 - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
 - 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
- Blank – The regulations clearly do not apply to this type of emission source.

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IX Applicable Louisiana and Federal Air Quality Requirements																														
ID No.:	Description	40 CFR 60							40 CFR 61					40 CFR 63										40 CFR 65			40 CFR 68			40 CFR 264
		A	Cd	Db	H	K	Ka	Kb	A	J	M	V	FF	A	DD	EEE	F	G*	GGG*	Q	XX*	ZZZZ	A	C	G	64	68	82	BB	
UNF002	Facility Wide	1							1		1		1	1	3			1	1		1						1	1		
ARE002	M4 – West End Sump																													
ARE003	M3 - Treatment Services Sumps																													
EQT008	30D260 – Spent Acid Tank							1																1	1					
EQT140	10 – Preheater; Acid Unit No. 1																													
EQT141	11 – Lime Silos																													
EQT142	12 – Oleum Loading Vent Scrubber																													
EQT146	20 – Sulfur Feed Tank																													
EQT147	21 – TS Vapor Combustor							1				1						1												
EQT149	24 – Oleum Barge Loading Scrubber																													
EQT150	26 – Spent Acid Barge Loading Scrubber																													
EQT151	27 – Acid Plant Vapor Combustor																						1		1					
EQT152	28 – Gasoline Storage Tank							3																						
EQT153	6-90 – Package Boiler			1																										
EQT154	M1a – Unit 2 Cooling Tower																				3									
EQT155	M1b – Unit 1 Cooling Tower																				3									
EQT285	20D380 – Unit 2 Weak Acid Tank					3	3	3																						
EQT157	30D030 – Oleum Tank					3	3	3																						
EQT158	30D040 – 93/Oleum					3	3	3																						
EQT159	30D050 – 99WW Tank					3	3	3																						
EQT161	30D070 – Spent Acid Tank					3	3	1															1	1						
EQT163	30D100 – Spent Acid Tank					3	3	1															1	1						
EQT164	30D110 – Spent Acid Tank					3	3	1															1	1						
EQT165	30D120 – Spent Acid Tank					3	3	1															1	1						
EQT166	30D130 – Oleum Tank					3	3	3																						
EQT167	30D140 – 99/Oleum/Spent					3	3	1															1	1						
EQT168	30D150 – 99/Oleum Spent					3	3	1															1	1						
EQT169	30D160 – Spent Acid Tank					3	3	1															1	1						
EQT170	30D180 – 93E Tank					3	3	3																						
EQT171	30D190 – Spent Acid Tank					3	3	1															1	1						
EQT173	30D210 – 93E Tank					3	3	3																						

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IX Applicable Louisiana and Federal Air Quality Requirements																														
ID No.:	Description	40 CFR 60							40 CFR 61					40 CFR 63										40 CFR 65			40 CFR 68			40 CFR 264
		A	Cd	Db	H	K	Ka	Kb	A	J	M	V	FF	A	DD	EEE	F	G*	GGG*	Q	XX*	ZZZZ	A	C	G	64	68	82	BB	
EQT174	30D220 – 99WW Tank					3	3	3																						
EQT175	30D230 – 99C Tank					3	3	3																						
EQT176	20D120/30D240 – IFS Mix Tank							3																						
EQT177	40D250 – Treatment Services Tank					3	3	1					1					1												
EQT178	40D280 – Treatment Services Tank					3	3	1					1					1												
EQT179	40D290 – Treatment Services Tank					3	3	3					1					1												
EQT180	40D200 – Treatment Services Tank					3	3	1					1					1												
EQT181	40D210 – Treatment Services Tank					3	3	3					1					1												
EQT182	40D300 – Treatment Services Tank					3	3	3					1					1												
EQT183	40D220 – Treatment Services Tank					3	3	3					1					1												
EQT184	30D103 – Sulfur Unloading Tank																													
EQT185	M7 – 001 Wastewater Treatment Unit							3																						
EQT186	1-06 – Rental Boiler			1																										
FUG002	FUG-ACID – Acid Plant Fugitive Emissions																							1						
FUG003	FUG-TS – Treatment Services Fugitive Emissions							1		1		1	1					1											1	
GRP002	CAP-SAU – Sulfuric Acid Units 1 & 2																													
GRP021	CAP-Comb - Combustion (Unit 1, Unit 2, Rental Boiler)																													
RLP013	2 – Sulfuric Acid Unit No. 2	1	1		1 [#]												3									1				
RLP014	3 – Sulfuric Acid Unit No. 1	1	1		1 [#]												3									1				
PCS001	Spt-Proc - Spent Acid Process																													
PCS002	TS-Proc - TS Process																													
EQT277	13 – Acid Plant Caustic Scrubber																													
EQT278	U1-Scbr – Unit 1 Tail Gas Scrubber																													
EQT279	U2-Scbr – Unit 2 Tail Gas Scrubber																													
EQT280	U1-Furn – Unit 1 Furnace												1					1							1					
EQT281	U2-RFurn – Unit 2 Regen Furnace							1					1					1												
EQT282	U2-SFurn – Unit 2 Sulfur Furnace																													

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IX Applicable Louisiana and Federal Air Quality Requirements																														
ID No.:	Description	40 CFR 60							40 CFR 61					40 CFR 63										40 CFR 65			40 CFR 64			40 CFR 264
		A	Cd	Db	H	K	Ka	Kb	A	J	M	V	FF	A	DD	EEE	F	G*	GGG*	Q	XX*	ZZZZ	A	C	G	64	68	82	BB	
EQT283	U1-Proc – Unit 1 Process																													
EQT284	U2-Proc – Unit 2 Process																													
EQT291	M10 – Diesel Fire-water Pump																					1								

*Although a minor source of Hazardous Air Pollutants, the facility is required to comply with the applicable requirements of 40 CFR 63 Subpart G, Subpart GGG, and Subpart XX for streams regulated under these subparts if/when required notice is received from the generator(s) of the regulated material.

#40 CFR 60 Subpart H requirements are being phased in at different times for RLP013 (January 1, 2011) & RLP014 (May 1, 2012).

KEY TO MATRIX

- 1 - The regulations have applicable requirements that apply to this particular emission source.
 - The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
 - 2 - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
 - 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
- Blank – The regulations clearly do not apply to this type of emission source.

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XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
UNF002 Facility Wide	40 CFR 63 Subpart DD – National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations 40 CFR 63.680(a)	DOES NOT APPLY – Facility is a minor source of emissions of HAPs.
EQT140, 146, 147, 151, 153, 186, and FUG002 (10, 20, 21, 27, 6-90, 1-06, and FUG-ACID)	Emission Standards for Sulfur Dioxide LAC 33:III.1503	EXEMPT - units emit less than 250 TPY of sulfur compounds measured as SO ₂ . LAC 33:III.1503.C
EQT150 26 – Spent Acid Barge Loading Scrubber	Control of Emissions of Organic Compounds – Marine Vapor Recovery LAC 33:III. 2108	DOES NOT APPLY – Uncontrolled emissions are less than 100 tpy of VOCs. LAC 33:III.2108.A
	Control of Emissions of Organic Compounds – Waste Gas Disposal LAC 33:III.2115	EXEMPT – Waste gas stream has a combined weight of VOCs equal to or less than 100 pounds in any continuous 24 hour period. LAC 33:III.2115.H.1.c
EQT 151 27 – Acid Plant Vapor Combustor	Control of Emission of Organic Compounds LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.
EQT152 28 – Gasoline Storage Tank	NSPS Subpart Kb – Standards of Performance for Storage Vessels for Petroleum Liquids 40 CFR 60.110b	DOES NOT APPLY – Storage capacity is less than 73 m ³ 40 CFR 60.110b

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XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
EQT154 and 155 M1a and M1b Cooling Towers	Emission Standards for Particulate Matter LAC 33:III.1311.C	EXEMPT – LDEQ has granted an exemption from the opacity standards of LAC 33:III.1311.C as the particulate matter emissions are well below the process rate limitation. LAC 33:III.1311.E
	40 CFR 63 Subpart Q – National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers 40 CFR 63.400	DOES NOT APPLY – The Baton Rouge site does not use chromium-based water treatment chemicals. 40 CFR 63.400(a)
EQT008 Spent Sulfuric Acid Storage Tank	Control of Emission of Organic Compounds LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.
EQTs 161, 163-165, 167-169, 171 Spent Acid Tanks	40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 40 CFR 60.110	DOES NOT APPLY – These tanks do not store petroleum liquids.
	40 CFR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984 40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.
	Control of Emission of Organic Compounds LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.

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XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT176 20D120/30D340 – IFS Mix Tank	40 CFR 60 Subpart Kb – Standards of Performance for Storage Volatile Organic Liquid Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 40 CFR 60.110(b)	DOES NOT APPLY – This tank is greater than 75 m ³ and less than 151 m ³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa. 40 CFR 60.110b(b)
CRG001 (EQTs 177, 178, 180) Tanks	40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 40 CFR 60.110	DOES NOT APPLY – These tanks do not store petroleum liquids.
	40 CFR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984 40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.
	LAC 33:III.2103.B – Storage of Volatile Organic Compounds	EXEMPT – Tanks at the Baton Rouge Rhodia, Inc. facility used for the storage of corrosive materials are not required to meet the submerged fill pipe provisions of subsections A and B of LAC 33:III.2103 per LAC 33:III.2103.G.7.
EQTs 179, 181-183 Tanks	40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 40 CFR 60.110	DOES NOT APPLY – These tanks do not store petroleum liquids.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

**Sulfuric Acid Plant – Baton Rouge Facility
Agency Interest No.: 1314
Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana**

XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQTs 179, 181-183 Tanks (cont'd)	40 CFR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984 40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.
	40 CFR 60 Subpart Kb – Standards of Performance for Storage Volatile Organic Liquid Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 40 CFR 60.110(b)	DOES NOT APPLY – These vessels have a capacity less than 75 m ³ . 40 CFR 60.110(b)(a)
EQT157 – 159, 162, 166, 170, 173 -175, 285 Tanks	40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 40 CFR 60.110	DOES NOT APPLY – These tanks do not store petroleum liquids.
	40 CFR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984 40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.
	40 CFR 60 Subpart Kb – Standards of Performance for Storage Volatile Organic Liquid Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 40 CFR 60.110(b)	DOES NOT APPLY – These tanks do not store VOLs.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Sulfuric Acid Plant – Baton Rouge Facility
Agency Interest No.: 1314
Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana

XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT280 Unit 1 Furnace	Control of Emission of Organic Compounds LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.
FUG002 FUG-ACID	Fugitive Emission Control for Ozone Nonattainment Areas LAC 33:III.2122	DOES NOT APPLY – This facility does not meet the applicability criteria of LAC 33:III.2122.A.1. It is not a SOCOMI facility per LAC 33:III.Chapter 21.Appendix A.
	Emission Control and Reduction Requirements and Standards LAC 33:III.5109.A	DOES NOT APPLY – This source does not emit any class I or class II TAPs for which site-wide permitted emissions are over the MER. LAC 33:III.5109.A
FUG003 FUG-TS	Fugitive Emission Control for Ozone Nonattainment Areas LAC 33:III.2122	DOES NOT APPLY – This facility does not meet the applicability criteria of LAC 33:III.2122.A.1. It is not a SOCOMI facility per LAC 33:III.Chapter 21.Appendix A.
RLP013 Sulfuric Acid Unit 2	40 CFR 63 Subpart G – National Emission Standards for Organic Hazardous Air Pollutants From the SOCOMI for Process Vents, Storage Vessels, Transfer Operations, and Wastewater 40 CFR 63.138(h)(2)(i)	EXEMPT – Per 40 CFR 63.138(h), this unit is exempt from the design evaluation or performance test requirements of 40 CFR 63.138(a)(3) and 40 CFR 63.138(j), and from the monitoring requirements of 40 CFR 63.132(a)(2)(iii), and from the associated recordkeeping and reporting requirements. 40 CFR 63.138(h)
	40 CFR 63 Subpart EEE – National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors 40 CFR 63.1200	DOES NOT APPLY – Facility is not subject to this subpart because the Unit 1 and 2 furnaces are not hazardous waste combustors as defined in the subpart. The Unit 1 and 2 furnaces are BIF facilities, not incinerators.
	Emission Standards for Sulfur Dioxide LAC 33:III Chapter 15	EXEMPT – Rhodia complies with LAC 33:III.Chapter 15 by complying with the more stringent requirements set forth in the Consent Decree and 40 CFR 60 Subpart H.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Sulfuric Acid Plant – Baton Rouge Facility

Agency Interest No.: 1314

Rhodia, Inc.

Baton Rouge, East Baton Rouge Parish, Louisiana

XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
RLP014 Sulfuric Acid Unit 1	40 CFR 63 Subpart G – National Emission Standards for Organic Hazardous Air Pollutants From the SOCMIs for Process Vents, Storage Vessels, Transfer Operations, and Wastewater 40 CFR 63.138(h)(2)(i)	EXEMPT – Per 40 CFR 63.138(h), this unit is exempt from the design evaluation or performance test requirements of 40 CFR 63.138(a)(3) and 40 CFR 63.138(j), and from the monitoring requirements of 40 CFR 63.132(a)(2)(iii), and from the associated recordkeeping and reporting requirements. 40 CFR 63.138(h)
	40 CFR 63 Subpart EEE – National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors 40 CFR 63.1200	DOES NOT APPLY – Facility is not subject to this subpart because the Unit 1 and 2 furnaces are not hazardous waste combustors as defined in the subpart. The Unit 1 and 2 furnaces are BIF facilities, not incinerators.
	Emission Standards for Sulfur Dioxide LAC 33:III Chapter 15	EXEMPT starting on May 1, 2012 – Rhodia complies with LAC 33:III Chapter 15 by complying with the more stringent requirements set forth in the Consent Decree and 40 CFR 60 Subpart H.

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Sulfuric Acid Plant – Baton Rouge Facility

Agency Interest No.: 1314

Rhodia, Inc.

Baton Rouge, East Baton Rouge Parish, Louisiana

Permittee shall comply with a streamlined equipment leaks monitoring program. Compliance with the streamlined program in accordance with this specific condition shall serve to comply with each of the applicable fugitive emission monitoring programs being streamlined, as indicated in the following table. Noncompliance with the streamlined program in accordance with this specific condition may subject the permittee to enforcement action for one or more of the applicable fugitive emissions programs.

- a. Permittee shall apply the streamlined program to the combined universe of components subject to any of the programs being streamlined. Any component type which does not require periodic monitoring under the overall most stringent program (LA MACT Determination for non-HON Facility Equipment Leaks) shall be monitored as required by the most stringent requirements of any other program being streamlined and will not be exempted. The streamlined program will include any exemptions based on size of component available in any of the programs being streamlined.
- b. Permittee shall use leak definitions and monitoring frequency based on the overall most stringent program. Percent leaker performance shall be calculated using the provisions of the overall most stringent program. Annual monitoring shall be defined as once every four quarters. Some allowance may be made in the first year of the streamlined program in order to allow for transition from existing monitoring schedules.
- c. Permittee shall comply with recordkeeping and reporting requirements of the overall most stringent program. Semiannual reports shall be submitted on September 30 and March 31, to cover the periods January 1 through June 30 and July 1 through December 31, respectively. The semiannual reports shall include any monitoring performed within the reporting period.

Unit or Plant Site	Programs Being Streamlined	Stream Applicability	Overall Most Stringent Program
Sulfuric Acid Plant	LAC 33:III.Chapter 51, LA MACT Determination for non-HON Equipment Leaks	≥ 5% VOTAP	LA MACT Determination for non-HON Equipment Leaks
	40 CFR 61 Subpart V, National Emission Standards for Equipment Leaks (Fugitive Emission Sources)	≥ 5% VOHAP	
	40 CFR 264 Subpart BB, RCRA Subpart BB	≥ 10% Organic	

General Information

AI ID: 1314 Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Also Known As:

ID	Name	User Group	Start Date
2203300033	AFS (EPA Air Facility System)	AFS (EPA Air Facility System)	01-01-2000
0840-00033	CDS Number	CDS Number	08-05-2002
8215111	EPA EIS Facility Site ID	EPA EIS Facility Site ID	01-01-2008
LAD008161234	Rhodia Inc	Hazardous Waste Notification	11-17-1980
PMT/PC	GPRA Baselines	Hazardous Waste Permitting	10-01-1997
00861	Rhone Poulenc Basic Chemical Co	Inactive & Abandoned Sites	11-23-1999
LAD008161234	Stauffer Chemical Co Baton Rouge	Inactive & Abandoned Sites	11-23-1999
LA0005223	LPDES #	LPDES Permit #	05-22-2003
	Priority 1 Emergency Site	Priority 1 Emergency Site	07-18-2006
GL-349	Radiation General License	Radiation License Number	12-14-2000
LA-338A-N01	Radioactive Material License	Radiation License Number	12-14-2000
G-033-3198	Site ID #	Solid Waste Facility No.	11-21-1999
22318	Rhone Poulenc Basic Chemical Co Baton Rouge	TEMPO Merge	01-07-2002
38329	Stauffer Chemical	TEMPO Merge	11-19-2001
38427	Rhodia Inc	TEMPO Merge	01-11-2001
70821STFFRAIRLI	TRI #	Toxic Release Inventory	07-19-2004

Physical Location:

1275 Airline Hwy
Baton Rouge, LA 70805Main FAX: 2253593722
Main Phone: 2253593481

Mailing Address:

1275 Airline Hwy
Baton Rouge, LA 70805

Location of Front Gate: 30.508417 latitude, -91.187938 longitude, Coordinate Method: Lat./Long - Decimal Degrees, Coordinate Datum: NAD83

Related People:

Name	Mailing Address	Phone (Type)	Relationship
S. B. "Bala" Balachandran	PO Box 828 Baton Rouge, LA 708210828	2253593443 (WF)	Accident Prevention Contact for
S. B. "Bala" Balachandran	PO Box 828 Baton Rouge, LA 708210828	2253593742 (WP)	Accident Prevention Contact for
Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Radiation Contact For
Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Radiation License Billing Party for
Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Water Billing Party for
Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Haz. Waste Billing Party for
J. Marcus Lewis	PO Box 828 Baton Rouge, LA 708210828	2253567111 (WP)	Responsible Official for
John Richardson	PO Box 828 Baton Rouge, LA 70821	JOHN.RICHARDSOI	Air Permit Contact For
John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Air Permit Contact For
John Richardson	PO Box 828 Baton Rouge, LA 70821	JOHN.RICHARDSOI	Accident Prevention Billing Party for

General Information
AI ID: 1314 Rhodia Inc
Activity Number: PER20110006
Permit Number: 0840-00033-V4
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Related People:	Name	Mailing Address	Phone (Type)	Relationship
	John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Accident Prevention Billing Party for
	John Richardson	PO Box 828 Baton Rouge, LA 70821	JOHN.RICHARDSOI	Emission Inventory Facility Contact for
	John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Emission Inventory Facility Contact for
	Daniel Tate	PO Box 828 Baton Rouge, LA 708210828		Responsible Official for

Related Organizations:	Name	Address	Phone (Type)	Relationship
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Air Billing Party for
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Operates
	Rhodia Inc	c/o CT Corporation System Baton Rouge, LA 70808		Agent of Service for
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Emission Inventory Billing Party
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Owns

NAIC Codes: 325188, All Other Basic Inorganic Chemical Manufacturing

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Spent Acid Process						
ARE 0002	M4 - West End Sump			55 gallons/mo	55 gallons/mo oil skimmed from sump	8760 hr/yr
EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank	950000 gallons				8760 hr/yr
EQT 0150	26 - Spent Acid Barge Loading Scrubber		800 gallons/min	28.4 MM gallons/yr		1664 hr/yr
EQT 0151	27 - Acid Plant Vapor Combustor		6.7 MM BTU/hr	6.7 MM BTU/hr	Includes Natural Gas and Waste Vent Gas	8760 hr/yr
EQT 0161	30D070 - Spent Acid Tank	125655 gallons				8760 hr/yr
EQT 0163	30D100 - Spent Acid Tank	227869 gallons				8760 hr/yr
EQT 0164	30D110 - Spent Acid Tank	227869 gallons				8760 hr/yr
EQT 0165	30D120 - Spent Acid Tank	227869 gallons				8760 hr/yr
EQT 0167	30D140 - 99/Oleum/Spent	331612 gallons				8760 hr/yr
EQT 0168	30D150 - 99/Oleum/Spent	285198 gallons				8760 hr/yr
EQT 0169	30D160 - Spent Acid Tank	285900 gallons				8760 hr/yr
EQT 0171	30D190 - Spent Acid Tank	285318 gallons				8760 hr/yr
EQT 0176	20D120/30D240 - IFS Mix Tank	25000 gallons				8760 hr/yr
EQT 0185	M7 - 001 Wastewater Treatment Unit			330000 gallons/day		8760 hr/yr
EQT 0277	13 - Acid Plant Caustic Scrubber			315 gallons/min	The control device is a scrubber (99% eff. SO ₂). Works in series with EIQ 151.	2190 hr/yr
FUG 0002	FUG-ACID - Acid Plant Fugitive Emissions					8760 hr/yr

INVENTORIES

AI ID: 1314 - Rhodia Inc
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Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
TS Process						
ARE 0003	M3 - Treatment Services Sumps			2500 gallons/day		8760 hr/yr
EQT 0147	21 - TS Vapor Combustor		11.6 MM BTU/hr	11.6 MM BTU/hr	Includes Natural Gas and Waste Vent Gas	8760 hr/yr
EQT 0177	40D250 - Treatment Services Tank	157000 gallons				8760 hr/yr
EQT 0178	40D280 - Treatment Services Tank	47000 gallons				8760 hr/yr
EQT 0179	40D290 - Treatment Services Tank	12000 gallons				8760 hr/yr
EQT 0180	40D200 - Treatment Services Tank	47000 gallons				8760 hr/yr
EQT 0181	40D210 - Treatment Services Tank	12000 gallons				8760 hr/yr
EQT 0182	40D300 - Treatment Services Tank	8000 gallons				8760 hr/yr
EQT 0183	40D220 - Treatment Services Tank	8000 gallons				8760 hr/yr
EQT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber			900 tons/day		8760 hr/yr
EQT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber			1900 tons/day		8760 hr/yr
EQT 0280	U1-Furn - Unit 1 Furnace			900 tons/day		8760 hr/yr
EQT 0281	U2-RFurn - Unit 2 Regen Furnace			1200 tons/day		8760 hr/yr
EQT 0282	U2-SFurn - Unit 2 Sulfur Furnace			700 tons/day		8760 hr/yr
EQT 0283	U1-Proc - Unit 1 Process			900 tons/day		8760 hr/yr
EQT 0284	U2-Proc - Unit 2 Process			1900 tons/day		8760 hr/yr
FUG 0003	FUG-TS - Treatment Services Fugitive Emissions					8760 hr/yr
RLP 0013	2 - Sulfuric Acid Unit No. 2		2280 tons/day	1900 tons/day		8760 hr/yr
RLP 0014	3 - Sulfuric Acid Unit No. 1		1080 tons/day	900 tons/day		8760 hr/yr

INVENTORIES

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Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Facility Wide						
EQT 0140	10 - Preheater; Acid Unit No. 1		6 MM BTU/hr	6 MM BTU/hr	This stack is equipped with a rain cap. A negligible velocity is used in modeling analyses.	8760 hr/yr
EQT 0141	11 - Lime Silos		22.5 tons/hr	135 Tons lime/year		6 hr/yr
EQT 0142	12 - Oleum Loading Vent Scrubber		150 gallons/min	2,664 MM gallons/yr	This stack is equipped with a rain cap. A negligible velocity is used in modeling analyses.	672 hr/yr
EQT 0146	20 - Sulfur Feed Tank	84460 gallons	110 gallons/min	44.6 MM gallons/yr		8760 hr/yr
EQT 0149	24 - Oleum Barge Loading Scrubber		600 gallons/min	12.96 MM gallons/yr		400 hr/yr
EQT 0152	28 - Gasoline Storage Tank	1000 gallons	10000 gallons/yr	10000 gallons/yr		8760 hr/yr
EQT 0153	6-90 - Package Boiler		106 MM BTU/hr	50 MM BTU/hr	Natural Gas	8760 hr/yr
EQT 0154	M1a - Unit 2 Cooling Tower			36000 gallons/min		8760 hr/yr
EQT 0155	M1b - Unit 1 Cooling Tower			16000 gallons/min		8760 hr/yr
EQT 0157	30D030 - Oleum Tank	158605 gallons				8760 hr/yr
EQT 0158	30D040 - 93/Oleum	158605 gallons				8760 hr/yr
EQT 0159	30D050 - 99WW Tank	158605 gallons				8760 hr/yr
EQT 0166	30D130 - Oleum Tank	331612 gallons				8760 hr/yr
EQT 0170	30D180 - 93E Tank	285247 gallons				8760 hr/yr
EQT 0173	30D210 - 93E Tank	406414 gallons				8760 hr/yr
EQT 0174	30D220 - 99WW Tank	406356 gallons				8760 hr/yr
EQT 0175	30D230 - 99C Tank	1.65 million gallons				8760 hr/yr
EQT 0184	20D103 - Sulfur Unloading Tank	150 gallons				8760 hr/yr
EQT 0186	1-06 - Rental Boiler		133 MM BTU/hr	133 MM BTU/hr		8760 hr/yr
EQT 0285	20D380 - Unit 2 Weak Acid Tank	21000 gallons				8760 hr/yr
EQT 0291	M10 - Diesel Fire-Water Pump		200 horsepower	200 horsepower		500 hr/yr

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Spent Acid Process							
ARE 0002	M4 - West End Sump						72
EQT 0150	26 - Spent Acid Barge Loading Scrubber	27.81	1000	.87		13	120
EQT 0151	27 - Acid Plant Vapor Combustor	2	2400	5		35	1350
EQT 0185	M7 - 001 Wastewater Treatment Unit						72
FUG 0002	FUG-ACID - Acid Plant Fugitive Emissions						72
TS Process							
ARE 0003	M3 - Treatment Services Sumps						72

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Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
TS Process							
EQT 0147	21 - TS Vapor Combustor	4	6786	6		50	1000
FUG 0003	FUG-TS - Treatment Services Fugitive Emissions						72
RLP 0013	2 - Sulfuric Acid Unit No. 2	113.9	108705	4.5		130	90
RLP 0014	3 - Sulfuric Acid Unit No. 1	118.1	50080	3		130	90
Facility Wide							
EQT 0140	10 - Preheater, Acid Unit No. 1	69	13006	2		38	1200
EQT 0141	11 - Lime Silos	6.7	250	.89		55	100
EQT 0142	12 - Oleum Loading Vent Scrubber	4.4	51.84	.5		15	100
EQT 0146	20 - Sulfur Feed Tank	2.7	183.22	1.2		30	284
EQT 0149	24 - Oleum Barge Loading Scrubber	19.7	100	.33		13	72
EQT 0152	28 - Gasoline Storage Tank	0	.02	.33		5	72
EQT 0153	6-90 - Package Boiler	25	14000	3.5		60	850
EQT 0154	M1a - Unit 2 Cooling Tower	25.6	945476	28		46	89
EQT 0155	M1b - Unit 1 Cooling Tower	27.9	526811	20		46	89
EQT 0186	1-06 - Rental Boiler	15.4	22000	5.5		20	470
EQT 0291	M10 - Diesel Fire-Water Pump	6.5	76.8	.5		9.25	355

Relationships:

ID	Description	Relationship	ID	Description
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0157	30D030 - Oleum Tank
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0158	30D040 - 93/Oleum
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0166	30D130 - Oleum Tank
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0182	40D300 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0181	40D210 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0180	40D200 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0179	40D290 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0178	40D280 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0177	40D250 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0183	40D220 - Treatment Services Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0161	30D070 - Spent Acid Tank

INVENTORIES

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Relationships:

ID	Description	Relationship	ID	Description
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0163	30D100 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0164	30D110 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0165	30D120 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0169	30D160 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0171	30D190 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0176	20D120/30D240 - IFS Mix Tank
EQT 0184	20D103 - Sulfur Unloading Tank	Vents to	EQT 0146	20 - Sulfur Feed Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0164	30D110 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0163	30D100 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0161	30D070 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Vents to	EQT 0151	27 - Acid Plant Vapor Combustor
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0165	30D120 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0176	20D120/30D240 - IFS Mix Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0171	30D190 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0169	30D160 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
EQT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber	Vents to	RLP 0014	3 - Sulfuric Acid Unit No. 1
EQT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber	Controls emissions from	EQT 0283	U1-Proc - Unit 1 Process
EQT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber	Controls emissions from	EQT 0284	U2-Proc - Unit 2 Process
EQT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber	Vents to	RLP 0013	2 - Sulfuric Acid Unit No. 2
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0165	30D120 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0164	30D110 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0163	30D100 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0161	30D070 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0169	30D160 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0176	20D120/30D240 - IFS Mix Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0171	30D190 - Spent Acid Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0182	40D300 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0178	40D280 - Treatment Services Tank

INVENTORIES

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

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Relationships:

ID	Description	Relationship	ID	Description
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0179	40D290 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0180	40D200 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0177	40D250 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0183	40D220 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0181	40D210 - Treatment Services Tank
EQT 0283	U1-Proc - Unit 1 Process	Controls emissions from	EQT 0280	U1-Furn - Unit 1 Furnace
EQT 0284	U2-Proc - Unit 2 Process	Controls emissions from	EQT 0282	U2-SFurn - Unit 2 Sulfur Furnace
EQT 0284	U2-Proc - Unit 2 Process	Controls emissions from	EQT 0281	U2-RFurn - Unit 2 Regen Furnace

Subject Item Groups:

ID	Group Type	Group Description
CRG 0001	Common Requirements Group	CRG001 - 40D250, 40D280, and 40D200
CRG 0002	Common Requirements Group	CRG002 - 40D290, 40D210, 40D300, and 40D220
CRG 0003	Common Requirements Group	CRG003 - Spent Acid Tanks
CRG 0004	Common Requirements Group	CRG004 - 99/Oleum/Spent Swing Tanks
GRP 0002	Equipment Group	CAP-SAU - SULFURIC ACID UNITS 1 & 2
GRP 0021	Equipment Group	CAP-Comb - CAP - Combustion (Unit 1, Unit 2, Rental Boiler)
PCS 0001	Process Group	Spt-Proc - Spent Acid Process
PCS 0002	Process Group	TS-Proc - TS Process
UNF 0002	Unit or Facility Wide	UNF02 - Facility Wide

Group Membership:

ID	Description	Member of Groups
ARE 0002	M4 - West End Sump	PCS0000000001
ARE 0003	M3 - Treatment Services Sumps	PCS0000000002
CRG 0001	CRG001 - 40D250, 40D280, and 40D200	PCS0000000002
CRG 0002	CRG002 - 40D290, 40D210, 40D300, and 40D220	PCS0000000002
CRG 0003	CRG003 - Spent Acid Tanks	PCS0000000001
CRG 0004	CRG004 - 99/Oleum/Spent Swing Tanks	PCS0000000001
EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank	CRG0000000003, PCS0000000001
EQT 0147	21 - TS Vapor Combustor	PCS0000000002
EQT 0150	26 - Spent Acid Barge Loading Scrubber	PCS0000000001
EQT 0151	27 - Acid Plant Vapor Combustor	PCS0000000001
EQT 0153	6-90 - Package Boiler	GRF0000000021
EQT 0161	30D070 - Spent Acid Tank	CRG0000000003, PCS0000000001
EQT 0163	30D100 - Spent Acid Tank	CRG0000000003, PCS0000000001
EQT 0164	30D110 - Spent Acid Tank	CRG0000000003, PCS0000000001
EQT 0165	30D120 - Spent Acid Tank	CRG0000000003, PCS0000000001

INVENTORIES

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Activity Number: PER20110006

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Group Membership:

ID	Description	Member of Groups
EQT 0167	30D140 - 99/Oleum/Spent	CRG0000000004, PCS0000000001
EQT 0168	30D150 - 99/Oleum/Spent	CRG0000000004, PCS0000000001
EQT 0169	30D160 - Spent Acid Tank	CRG0000000003, PCS0000000001
EQT 0171	30D190 - Spent Acid Tank	CRG0000000003, PCS0000000001
EQT 0176	20D120/30D240 - IFS Mix Tank	PCS0000000001
EQT 0177	40D250 - Treatment Services Tank	CRG0000000001, PCS0000000002
EQT 0178	40D280 - Treatment Services Tank	CRG0000000001, PCS0000000002
EQT 0179	40D290 - Treatment Services Tank	CRG0000000002, PCS0000000002
EQT 0180	40D200 - Treatment Services Tank	CRG0000000001, PCS0000000002
EQT 0181	40D210 - Treatment Services Tank	CRG0000000002, PCS0000000002
EQT 0182	40D300 - Treatment Services Tank	CRG0000000002, PCS0000000002
EQT 0183	40D220 - Treatment Services Tank	CRG0000000002, PCS0000000002
EQT 0185	M7 - 001 Wastewater Treatment Unit	PCS0000000001
EQT 0186	1-06 - Rental Boiler	GRP0000000021
EQT 0277	13 - Acid Plant Caustic Scrubber	PCS0000000001
EQT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber	PCS0000000002
EQT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber	PCS0000000002
EQT 0280	U1-Furn - Unit 1 Furnace	PCS0000000002
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	PCS0000000002
EQT 0282	U2-SFurn - Unit 2 Sulfur Furnace	PCS0000000002
EQT 0283	U1-Proc - Unit 1 Process	PCS0000000002
EQT 0284	U2-Proc - Unit 2 Process	PCS0000000002
FUG 0002	FUG-ACID - Acid Plant Fugitive Emissions	PCS0000000001
FUG 0003	FUG-TS - Treatment Services Fugitive Emissions	PCS0000000002
RLP 0013	2 - Sulfuric Acid Unit No. 2	GRP0000000002, GRP0000000021, PCS0000000002
RLP 0014	3 - Sulfuric Acid Unit No. 1	GRP0000000002, GRP0000000021, PCS0000000002

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0540	0540 Sulphuric Acid Manufacture (Rated Capacity)	2800	tons/day

SIC Codes:

2819	Industrial inorganic chemicals, nec	AI 1314
2819	Industrial inorganic chemicals, nec	UNF 002

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO2e

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

All phases

Subject Item	CO			NOx			PM10			SO2		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Spent Acid Process												
ARE 0002 M4												
EQT 0150 26										0.002	0.03	<0.01
EQT 0151 27	1.69	15.13	7.40	0.29	4.01	1.29	0.01	0.03	0.03	0.01	0.40	0.04
EQT 0185 M7												
FUG 0002 FUG-ACID										0.31	-	1.38
TS Process												
ARE 0003 M3												
EQT 0147 21	0.92	6.40	4.04	0.88	6.99	3.85	0.08	0.08	0.37	0.06	0.28	0.25
FUG 0003 FUG-TS												
RLP 0013 2		74.61			134.56			23.75				
RLP 0014 3		44.26			63.27			11.25			904.17	
Facility Wide												
EQT 0140 10	0.47	0.47	2.06	0.56	0.56	2.45	0.04	0.04	0.19	0.03	0.03	0.14
EQT 0141 11							2.48		0.01			
EQT 0146 20										0.003		0.01
EQT 0152 28												
EQT 0153 6-90		18.76			21.20			1.27			0.58	
EQT 0154 M1a							0.63		2.76			
EQT 0155 M1b							0.28		1.23			
EQT 0186 1-06		3.59			5.05			0.99			0.08	
EQT 0291 M10	1.34		0.33	6.20		1.55	0.44		0.11	0.41		0.10
GRP 0002 CAP-SAU												

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO2e

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

All phases

Subject Item	VOC			Lead		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Spent Acid Process						
ARE 0002 M4	0.03		0.14			
EQT 0150 26	1.12	51.40	0.93			
EQT 0151 27	0.45	7.64	1.95			
EQT 0185 M7	0.44		1.91			
FUG 0002 FUG-ACID	0.15		0.65			
TS Process						
ARE 0003 M3	0.02		0.07			
EQT 0147 21	0.21	0.28	0.92			
FUG 0003 FUG-TS	0.67		2.94			
RLP 0013 2		2.73			0.12	
RLP 0014 3		0.94			0.08	
Facility Wide						
EQT 0140 10	0.03	0.03	0.13			
EQT 0141 11						
EQT 0146 20	0.004		0.02			
EQT 0152 28	0.07		0.29			
EQT 0153 6-90		2.97				
EQT 0154 M1a						
EQT 0155 M1b						
EQT 0186 1-06		0.72				
EQT 0291 M10	0.50		0.13			
GRP 0002 CAP-SAU				0.02		0.08

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO2e

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

All phases

Subject Item	CO			NOx			PM10			SO2		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Facility Wide												
GRP 0021 CAP-Comb	20.54		89.98	25.00		109.50	12.27		53.73			

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO2e

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

All phases

Subject Item	VOC			Lead		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Facility Wide						
GRP 0021 CAP-Comb	4.46		19.52			

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO2e

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Phase II

Subject Item	SO2		
	Avg lb/hr	Max lb/hr	Tons/Year
TS Process			
RLP 0014 3		904.17	
Facility Wide			
GRP 0021 CAP-Comb	1078.61		4723.13

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

Emission rates Notes:

GRP 0021	SO2	Avg lb/hr	Phase II is effective from January 1, 2011 through April 30, 2012. Which Months: All Year
GRP 0021	SO2	Tons/Year	Phase II is effective from January 1, 2011 through April 30, 2012. Which Months: All Year
RLP 0014	SO2	Max lb/hr	Max lbs/hr effective from permit issuance until April 30, 2012. A 3-hour average becomes effective on May 1, 2012. Which Months: All Year

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO2e

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

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Air - Title V Regular Permit Minor Mod

Phase III

Subject Item	SO2	
	Avg lb/hr	Tons/Year
Facility Wide		
GRP 0021 CAP-Comb	245.69	1074.94

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

Emission rates Notes:

GRP 0021	SO2	Avg lb/hr	Phase III becomes effective on May 1, 2012. Which Months: All Year
GRP 0021	SO2	Tons/Year	Phase III becomes effective on May 1, 2012. Which Months: All Year

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20110006
Permit Number: 0840-00033-V4
Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0142 12	Sulfuric acid	0.01	0.09	<0.01
EQT 0146 20	Carbon disulfide	0.004		0.02
	Hydrogen sulfide	0.10		0.44
EQT 0147 21	Chlorine	0.004	0.03	0.02
	Hydrochloric acid	0.08	0.52	0.36
EQT 0149 24	Sulfuric acid	0.004	0.01	<0.01
EQT 0151 27	Chlorine	0.005	0.11	0.02
	Hydrochloric acid	0.09	2.24	0.39
EQT 0152 28	2,2,4-Trimethylpentane	0.001		<0.01
	Benzene	0.001		<0.01
	Ethyl benzene	<0.001		<0.01
	Toluene	0.001		<0.01
	Xylene (mixed isomers)	<0.001		<0.01
	n-Hexane	0.001		<0.01
FUG 0002 FUG-ACID	Sulfuric acid	0.10		0.46
GRP 0002 CAP-SAU	Antimony (and compounds)	0.007		0.032
	Arsenic (and compounds)	0.005		0.022
	Barium (and compounds)	0.041		0.181
	Beryllium (Table 51.1)	0.003		0.012
	Cadmium (and compounds)	0.003		0.012
	Chlorine	0.39		1.70
	Chromium VI (and compounds)	0.007		0.030
	Cobalt compounds	0.01		0.03
	Copper (and compounds)	0.025		0.111
	Hydrochloric acid	0.82		3.59
	Manganese (and compounds)	0.02		0.08
	Mercury (and compounds)	0.003		0.012
	Nickel (and compounds)	0.009		0.038
	Selenium (and compounds)	0.013		0.056
	Sulfuric acid	9.57		41.90
	Zinc (and compounds)	0.05		0.22
PCS 0001 Spt-Proc	1,1,1-Trichloroethane	0.11		0.50
	1,1,2,2-Tetrachloroethane	0.005		0.02

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20110006
Permit Number: 0840-00033-V4
Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	1,1,2-Trichloroethane	0.05		0.20
	1,1-Dichloroethane	0.11		0.50
	1,1-Dimethylhydrazine	0.11		0.50
	1,2,4-Trichlorobenzene	0.11		0.50
	1,2-Dibromo-3-chloropropane	0.11		0.50
	1,2-Dibromoethane	<0.001		0.001
	1,2-Dichloroethane	0.001		0.002
	1,2-Dichloropropane	0.11		0.50
	1,2-Diphenylhydrazine	0.11		0.50
	1,2-Epoxybutane	0.11		0.50
	1,2-Epoxyethylbenzene	0.11		0.50
	1,2-Oxathiolane 2,2-dioxide	0.11		0.50
	1,3-Butadiene	<0.001		0.001
	1,3-Dichloropropene	0.005		0.02
	1,4-Dichlorobenzene	0.11		0.50
	1,4-Dioxane	0.01		0.05
	2,2'-dichlorodiethylether	0.03		0.11
	2,2,4-Trimethylpentane	0.11		0.50
	2,4,5-Trichlorophenol	0.11		0.50
	2,4,6-Trichlorophenol	0.11		0.50
	2,4-Dichlorophenoxyacetic Acid	0.11		0.50
	2,4-Dinitrophenol	0.11		0.50
	2,4-Dinitrotoluene	0.002		0.01
	2,4-Toluene diamine	0.11		0.50
	2,6-Dinitrotoluene	0.002		0.01
	2-Acetylaminofluorene	0.11		0.50
	2-nitro-Propane	0.03		0.14
	3,3'-Dichlorobenzidine	0.11		0.50
	4,4'-Methylenebis-(2-Chloroaniline)	0.11		0.50
	4,4'-Methylenebisbenzeneamine	0.11		0.50
	4,6 Dinitro-o-cresol	0.11		0.50
	4-Aminodiphenyl	0.11		0.50
	4-Dimethylaminoazobenzene	0.11		0.50

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	4-Nitrobiphenyl	0.11		0.50
	4-Nitrophenol	0.11		0.50
	Acetaldehyde	0.01		0.04
	Acetamide	0.11		0.50
	Acetonitrile	0.06		0.25
	Acetophenone	0.11		0.50
	Acrolein	<0.001		0.001
	Acrylamide	<0.001		0.001
	Acrylic acid	0.005		0.02
	Acrylonitrile	<0.001		0.002
	Allyl chloride	<0.001		0.001
	Amiben	0.11		0.50
	Ammonia	0.01		0.06
	Aniline	0.01		0.03
	Benzene	0.002		0.01
	Benzidine	0.11		0.50
	Benzotrachloride	0.11		0.50
	Benzyl chloride	0.11		0.50
	Biphenyl	0.002		0.01
	Bromoform	0.11		0.50
	Butene (mixed isomers)	0.11		0.50
	Calcium cyanamide	0.11		0.50
	Captan	0.11		0.50
	Carbaryl	0.11		0.50
	Carbon disulfide	0.03		0.12
	Carbon tetrachloride	0.002		0.01
	Carbonyl sulfide	0.01		0.05
	Chlordane	0.11		0.50
	Chlorine dioxide	<0.001		0.001
	Chloroacetic acid	0.11		0.50
	Chlorobenzene	<0.001		0.001
	Chloroethane	0.11		0.50
	Chloroform	0.002		0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
 Activity Number: PER20110006
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 Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	Chloromethyl methyl ether	0.11		0.50
	Chloroprene	0.03		0.14
	Cresol	0.02		0.08
	Cumene	0.11		0.50
	Cyanide compounds	0.11		0.50
	Diaminotoluene (mixed isomers)	0.002		0.01
	Diazomethane	0.11		0.50
	Dibutyl phthalate	0.005		0.02
	Dichloromethane	0.01		0.03
	Dichlorvos	0.11		0.50
	Diethanolamine	0.11		0.50
	Diethyl Sulfate	0.11		0.50
	Dimethyl formamide	0.11		0.50
	Dimethyl phthalate	0.11		0.50
	Dimethyl sulfate	0.11		0.50
	Dimethylcarbamoyl chloride	0.11		0.50
	Epichlorohydrin	0.04		0.17
	Ethyl 4,4'-Dichlorobenzilate	0.11		0.50
	Ethyl Acrylate	0.02		0.08
	Ethyl benzene	0.11		0.50
	Ethylene	0.11		0.50
	Ethylene glycol	0.10		0.45
	Ethylene oxide	<0.001		0.002
	Ethyleneimine	0.11		0.50
	Ethylenethiourea	0.11		0.50
	Formaldehyde	0.002		0.01
	Glycol ethers (Table 51.1)	0.01		0.06
	Glycol ethers (Table 51.3)	0.11		0.50
	Heptachlor	0.11		0.50
	Hexachlorobenzene	0.01		0.04
	Hexachlorobutadiene	<0.001		0.001
	Hexachlorocyclopentadiene	0.11		0.50
	Hexachloroethane	0.01		0.04

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	Hexamethylene diisocyanate	0.11		0.50
	Hexamethylphosphoramide	0.11		0.50
	Hydrazine	<0.001		0.001
	Hydrofluoric acid	0.002		0.01
	Hydrogen cyanide	0.01		0.04
	Hydrogen sulfide	0.002		0.01
	Hydroquinone	0.11		0.50
	Iodomethane	0.11		0.50
	Isophorone	0.11		0.50
	Lindane	0.11		0.50
	Maleic anhydride	0.002		0.01
	Methanol	0.11		0.50
	Methoxychlor	0.11		0.50
	Methyl Isocyanate	0.11		0.50
	Methyl Tertiary Butyl Ether	0.11		0.50
	Methyl bromide	0.11		0.50
	Methyl chloride	0.09		0.39
	Methyl ethyl ketone	0.11		0.50
	Methyl isobutyl ketone	0.002		0.01
	Methyl methacrylate	0.11		0.50
	Methylene diphenyl diisocyanate	0.11		0.50
	Monomethyl hydrazine	0.11		0.50
	N,N-Diethyl aniline	0.11		0.50
	N,N-dimethylbenzenamine	0.11		0.50
	N-Nitroso-N-Methylurea	0.11		0.50
	N-Nitrosodimethylamine	0.11		0.50
	N-Nitrosomorpholine	0.11		0.50
	Naphthalene (and Methyl naphthalenes)	0.02		0.10
	Nitric acid	0.005		0.02
	Nitrobenzene	0.005		0.02
	Parathion	0.11		0.50
	Pentachloronitrobenzene	0.11		0.50
	Phenol	0.005		0.02

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20110006
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Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	Phosgene	<0.001		0.002
	Phosphine	0.11		0.50
	Phosphorus, Total (as P)	0.11		0.50
	Phthalic Anhydride	0.005		0.02
	Polychlorinated biphenyls	0.11		0.50
	Polynuclear Aromatic Hydrocarbons	<0.001		0.001
	Propionaldehyde	0.01		0.04
	Propoxur	0.11		0.50
	Propylene	0.11		0.50
	Propylene oxide	0.01		0.04
	Propylenimine	0.11		0.50
	Pyridine	0.01		0.06
	Pyrocatechol	0.11		0.50
	Quinoline	0.11		0.50
	Quinone	0.11		0.50
	Styrene	0.02		0.10
	Tetrachloroethylene	0.03		0.14
	Titanium tetrachloride	0.11		0.50
	Toluene	0.11		0.50
	Toluene-2,4-diisocyanate	<0.001		0.001
	Toluene-2,6-Diisocyanate	<0.001		0.001
	Toxaphene	0.11		0.50
	Toxic air pollutants (TAP)	0.21		0.59
	Trichloroethylene	0.01		0.05
	Triethyl amine	0.11		0.50
	Trifluralin	0.11		0.50
	Urethane	0.11		0.50
	Vinyl acetate	0.03		0.13
	Vinyl bromide	0.11		0.50
	Vinyl chloride	0.002		0.01
	Vinylidene chloride	0.02		0.08
	Xylene (mixed isomers)	0.11		0.50
	alpha-Chloroacetophenone	0.11		0.50

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20110006
Permit Number: 0840-00033-V4
Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	beta-Propiolactone	0.11		0.50
	bis(2-ethylhexyl)phthalate	0.11		0.50
	bis(Chloromethyl)ether	0.11		0.50
	n-Hexane	0.11		0.50
	n-butyl alcohol	0.11		0.50
	o-Aminoanisole	0.11		0.50
	o-dianisidine	0.11		0.50
	ortho-Tolidine	0.11		0.50
	ortho-Toluidine	0.11		0.50
	p,p'-DDE	0.11		0.50
	para-Phenylenediamine	0.11		0.50
	pentachloro-Phenol	0.11		0.50
PCS 0002 TS-Proc	1,1,1-Trichloroethane	0.11		0.50
	1,1,2,2-Tetrachloroethane	0.03		0.12
	1,1,2-Trichloroethane	0.11		0.50
	1,1-Dichloroethane	0.11		0.50
	1,1-Dimethylhydrazine	0.11		0.50
	1,2,4-Trichlorobenzene	0.11		0.50
	1,2-Dibromo-3-chloropropane	0.11		0.50
	1,2-Dibromoethane	0.003		0.011
	1,2-Dichloroethane	0.005		0.021
	1,2-Dichloropropane	0.11		0.50
	1,2-Diphenylhydrazine	0.11		0.50
	1,2-Epoxybutane	0.11		0.50
	1,2-Epoxyethylbenzene	0.11		0.50
	1,2-Oxathiolane 2,2-dioxide	0.11		0.50
	1,3-Butadiene	0.003		0.011
	1,3-Dichloropropene	0.03		0.14
	1,4-Dichlorobenzene	0.11		0.50
	1,4-Dioxane	0.10		0.44
	2,2'-dichlorodiethylether	0.11		0.50
	2,2,4-Trimethylpentane	0.11		0.50
	2,4,5-Trichlorophenol	0.11		0.50

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20110006
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Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0002 TS-Proc	2,4,6-Trichlorophenol	0.11		0.50
	2,4-Dichlorophenoxyacetic Acid	0.11		0.50
	2,4-Dinitrophenol	0.11		0.50
	2,4-Dinitrotoluene	0.01		0.03
	2,4-Toluene diamine	0.11		0.50
	2,6-Dinitrotoluene	0.01		0.03
	2-Acetylaminofluorene	0.11		0.50
	2-nitro-Propane	0.11		0.50
	3,3'-Dichlorobenzidine	0.11		0.50
	4,4'-Methylenebis-(2-Chloroaniline)	0.11		0.50
	4,4'-Methylenebisbenzeneamine	0.11		0.50
	4,6 Dinitro-o-cresol	0.11		0.50
	4-Aminodiphenyl	0.11		0.50
	4-Dimethylaminoazobenzene	0.11		0.50
	4-Nitrobiphenyl	0.11		0.50
	4-Nitrophenol	0.11		0.50
	Acetaldehyde	0.07		0.30
	Acetamide	0.11		0.50
	Acetonitrile	0.11		0.50
	Acetophenone	0.11		0.50
	Acrolein	0.003		0.011
	Acrylamide	0.003		0.011
	Acrylic acid	0.04		0.17
	Acrylonitrile	0.003		0.015
	Allyl chloride	0.003		0.011
	Amiben	0.11		0.50
	Ammonia	0.11		0.50
	Aniline	0.06		0.26
	Benzene	0.02		0.10
	Benzidine	0.11		0.50
	Benzotrichloride	0.11		0.50
	Benzyl chloride	0.11		0.50
	Biphenyl	0.01		0.03

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
 Activity Number: PER20110006
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 Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0002 TS-Proc	Bromoform	0.11		0.50
	Butene (mixed isomers)	0.11		0.50
	Calcium cyanamide	0.11		0.50
	Captan	0.11		0.50
	Carbaryl	0.11		0.50
	Carbon disulfide	0.11		0.50
	Carbon tetrachloride	0.01		0.03
	Carbonyl sulfide	0.10		0.43
	Chlordane	0.11		0.50
	Chlorine dioxide	0.003		0.011
	Chloroacetic acid	0.11		0.50
	Chlorobenzene	0.003		0.011
	Chloroethane	0.11		0.50
	Chloroform	0.005		0.02
	Chloromethyl methyl ether	0.11		0.50
	Chloroprene	0.11		0.50
	Cresol	0.11		0.50
	Cumene	0.11		0.50
	Cyanide compounds	0.11		0.50
	Diaminotoluene (mixed isomers)	0.03		0.11
	Diazomethane	0.11		0.50
	Dibutyl phthalate	0.04		0.16
	Dichloromethane	0.05		0.23
	Dichlorvos	0.11		0.50
	Diethanolamine	0.11		0.50
	Diethyl Sulfate	0.11		0.50
	Dimethyl formamide	0.11		0.50
	Dimethyl phthalate	0.11		0.50
	Dimethyl sulfate	0.11		0.50
	Dimethylcarbamoyl chloride	0.11		0.50
	Epichlorohydrin	0.11		0.50
	Ethyl 4,4'-Dichlorobenzilate	0.11		0.50
	Ethyl Acrylate	0.11		0.50

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20110006
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Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0002 TS-Proc	Ethyl benzene	0.11		0.50
	Ethylene	0.11		0.50
	Ethylene glycol	0.11		0.50
	Ethylene oxide	0.003		0.015
	Ethyleneimine	0.11		0.50
	Ethylenethiourea	0.11		0.50
	Formaldehyde	0.03		0.11
	Glycol ethers (Table 51.1)	0.11		0.50
	Glycol ethers (Table 51.3)	0.11		0.50
	Heptachlor	0.11		0.50
	Hexachlorobenzene	0.08		0.37
	Hexachlorobutadiene	0.003		0.011
	Hexachlorocyclopentadiene	0.11		0.50
	Hexachloroethane	0.07		0.30
	Hexamethylene diisocyanate	0.11		0.50
	Hexamethylphosphoramide	0.11		0.50
	Hydrazine	0.003		0.011
	Hydrofluoric acid	0.005		0.02
	Hydrogen cyanide	0.08		0.34
	Hydrogen sulfide	0.01		0.04
	Hydroquinone	0.11		0.50
	Iodomethane	0.11		0.50
	Isophorone	0.11		0.50
	Lindane	0.11		0.50
	Maleic anhydride	0.005		0.02
	Methanol	0.11		0.50
	Methoxychlor	0.11		0.50
	Methyl isocyanate	0.11		0.50
	Methyl Tertiary Butyl Ether	0.11		0.50
	Methyl bromide	0.11		0.50
	Methyl chloride	0.11		0.50
	Methyl ethyl ketone	0.11		0.50
	Methyl isobutyl ketone	0.002		0.01

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 Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0002 TS-Proc	Methyl methacrylate	0.11		0.50
	Methylene diphenyl diisocyanate	0.11		0.50
	Monomethyl hydrazine	0.11		0.50
	N,N-Diethyl aniline	0.11		0.50
	N,N-dimethylbenzenamine	0.11		0.50
	N-Nitroso-N-Methylurea	0.11		0.50
	N-Nitrosodimethylamine	0.11		0.50
	N-Nitrosomorpholine	0.11		0.50
	Naphthalene (and Methyl naphthalenes)	0.11		0.50
	Nitric acid	0.03		0.12
	Nitrobenzene	0.04		0.17
	Parathion	0.11		0.50
	Pentachloronitrobenzene	0.11		0.50
	Phenol	0.04		0.16
	Phosgene	0.003		0.012
	Phosphine	0.11		0.50
	Phosphorus, Total (as P)	0.11		0.50
	Phthalic Anhydride	0.04		0.17
	Polychlorinated biphenyls	0.11		0.50
	Polynuclear Aromatic Hydrocarbons	0.003		0.011
	Propionaldehyde	0.07		0.30
	Propoxur	0.11		0.50
	Propylene	0.11		0.50
	Propylene oxide	0.07		0.30
	Propylenimine	0.11		0.50
	Pyridine	0.11		0.50
	Pyrocatechol	0.11		0.50
	Quinoline	0.11		0.50
	Quinone	0.11		0.50
	Styrene	0.11		0.50
	Tetrachloroethylene	0.11		0.50
	Titanium tetrachloride	0.11		0.50
	Toluene	0.11		0.50

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
 Activity Number: PER20110006
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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0002 TS-Proc	Toluene-2,4-diisocyanate	0.003		0.011
	Toluene-2,6-Diisocyanate	0.003		0.011
	Toxaphene	0.11		0.50
	Toxic air pollutants (TAP)	0.46		2.03
	Trichloroethylene	0.09		0.38
	Triethyl amine	0.11		0.50
	Trifluralin	0.11		0.50
	Urethane	0.11		0.50
	Vinyl acetate	0.11		0.50
	Vinyl bromide	0.11		0.50
	Vinyl chloride	0.02		0.10
	Vinylidene chloride	0.11		0.50
	Xylene (mixed isomers)	0.11		0.50
	alpha-Chloroacetophenone	0.11		0.50
	beta-Propiolactone	0.11		0.50
	bis(2-ethylhexyl)phthalate	0.11		0.50
	bis(Chloromethyl)ether	0.11		0.50
	n-Hexane	0.11		0.50
	n-butyl alcohol	0.11		0.50
	o-Aminoanisole	0.11		0.50
	o-dianisidine	0.11		0.50
	ortho-Tolidine	0.11		0.50
	ortho-Toluidine	0.11		0.50
	p,p'-DDE	0.11		0.50
	para-Phenylenediamine	0.11		0.50
	pentachloro-Phenol	0.11		0.50
RLP 0013 2	Antimony (and compounds)		0.671	
	Arsenic (and compounds)		0.001	
	Barium (and compounds)		1.313	
	Beryllium (Table 51.1)		0.001	
	Cadmium (and compounds)		0.001	
	Chlorine		0.57	
	Chromium VI (and compounds)		0.006	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20110006
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Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
RLP 0013 2	Cobalt compounds		0.17	
	Copper (and compounds)		0.632	
	Hydrochloric acid		2.12	
	Manganese (and compounds)		0.43	
	Mercury (and compounds)		0.013	
	Nickel (and compounds)		0.006	
	Selenium (and compounds)		0.413	
	Sulfuric acid		11.88	
	Zinc (and compounds)		1.24	
RLP 0014 3	Antimony (and compounds)		0.466	
	Arsenic (and compounds)		0.004	
	Barium (and compounds)		0.778	
	Beryllium (Table 51.1)		<0.001	
	Cadmium (and compounds)		<0.001	
	Chlorine		0.21	
	Chromium VI (and compounds)		0.001	
	Cobalt compounds		0.10	
	Copper (and compounds)		0.379	
	Hydrochloric acid		14.87	
	Manganese (and compounds)		0.26	
	Mercury (and compounds)		0.011	
	Nickel (and compounds)		0.003	
	Selenium (and compounds)		0.373	
	Sulfuric acid		5.63	
	Zinc (and compounds)		0.75	
UNF 0002 UNF02	1,1,1-Trichloroethane			1.00
	1,1,2,2-Tetrachloroethane			0.14
	1,1,2-Trichloroethane			0.70
	1,1-Dichloroethane			1.00
	1,1-Dimethylhydrazine			1.00
	1,2,4-Trichlorobenzene			1.00
	1,2-Dibromo-3-chloropropane			1.00
	1,2-Dibromoethane			0.012

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002 UNF02	1,2-Dichloroethane			0.023
	1,2-Dichloropropane			1.00
	1,2-Diphenylhydrazine			1.00
	1,2-Epoxybutane			1.00
	1,2-Epoxyethylbenzene			1.00
	1,2-Oxathiolane 2,2-dioxide			1.00
	1,3-Butadiene			0.012
	1,3-Dichloropropene			0.16
	1,4-Dichlorobenzene			1.00
	1,4-Dioxane			0.49
	2,2'-dichlorodiethylether			0.61
	2,2,4-Trimethylpentane			1.01
	2,4,5-Trichlorophenol			1.00
	2,4,6-Trichlorophenol			1.00
	2,4-Dichlorophenoxyacetic Acid			1.00
	2,4-Dinitrophenol			1.00
	2,4-Dinitrotoluene			0.04
	2,4-Toluene diamine			1.00
	2,6-Dinitrotoluene			0.04
	2-Acetylaminofluorene			1.00
	2-nitro-Propane			0.64
	3,3'-Dichlorobenzidine			1.00
	4,4'-Methylenebis-(2-Chloroaniline)			1.00
	4,4'-Methylenebisbenzeneamine			1.00
	4,6 Dinitro-o-cresol			1.00
	4-Aminodiphenyl			1.00
	4-Dimethylaminoazobenzene			1.00
	4-Nitrobiphenyl			1.00
	4-Nitrophenol			1.00
	Acetaldehyde			0.34
	Acetamide			1.00
	Acetonitrile			0.75
	Acetophenone			1.00

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002 UNF02	Acrolein			0.012
	Acrylamide			0.012
	Acrylic acid			0.19
	Acrylonitrile			0.017
	Allyl chloride			0.012
	Amiben			1.00
	Ammonia			0.56
	Aniline			0.29
	Antimony (and compounds)			0.032
	Arsenic (and compounds)			0.022
	Barium (and compounds)			0.181
	Benzene			0.12
	Benzidine			1.00
	Benzotrichloride			1.00
	Benzyl chloride			1.00
	Beryllium (Table 51.1)			0.012
	Biphenyl			0.04
	Bromoform			1.00
	Butene (mixed isomers)			1.00
	Cadmium (and compounds)			0.012
	Calcium cyanamide			1.00
	Captan			1.00
	Carbaryl			1.00
	Carbon disulfide			0.64
	Carbon tetrachloride			0.04
	Carbonyl sulfide			0.48
	Chlordane			1.00
	Chlorine			1.74
	Chlorine dioxide			0.012
	Chloroacetic acid			1.00
	Chlorobenzene			0.012
	Chloroethane			1.00
	Chloroform			0.03

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002 UNF02	Chloromethyl methyl ether			1.00
	Chloroprene			0.64
	Chromium VI (and compounds)			0.030
	Cobalt compounds			0.03
	Copper (and compounds)			0.111
	Cresol			0.58
	Cumene			1.00
	Cyanide compounds			1.00
	Diaminotoluene (mixed isomers)			0.12
	Diazomethane			1.00
	Dibutyl phthalate			0.18
	Dichloromethane			0.26
	Dichlorvos			1.00
	Diethanolamine			1.00
	Diethyl Sulfate			1.00
	Dimethyl formamide			1.00
	Dimethyl phthalate			1.00
	Dimethyl sulfate			1.00
	Dimethylcarbamoyl chloride			1.00
	Epichlorohydrin			0.67
	Ethyl 4,4'-Dichlorobenzilate			1.00
	Ethyl Acrylate			0.58
	Ethyl benzene			1.01
	Ethylene			1.00
	Ethylene glycol			0.95
	Ethylene oxide			0.017
	Ethyleneimine			1.00
	Ethylenethiourea			1.00
	Formaldehyde			0.12
	Glycol ethers (Table 51.1)			0.56
	Glycol ethers (Table 51.3)			1.00
	Heptachlor			1.00
	Hexachlorobenzene			0.41

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002 UNF02	Hexachlorobutadiene			0.012
	Hexachlorocyclopentadiene			1.00
	Hexachloroethane			0.34
	Hexamethylene diisocyanate			1.00
	Hexamethylphosphoramide			1.00
	Hydrazine			0.012
	Hydrochloric acid			4.34
	Hydrofluoric acid			0.03
	Hydrogen cyanide			0.38
	Hydrogen sulfide			0.49
	Hydroquinone			1.00
	Iodomethane			1.00
	Isophorone			1.00
	Lindane			1.00
	Maleic anhydride			0.03
	Manganese (and compounds)			0.08
	Mercury (and compounds)			0.012
	Methanol			1.00
	Methoxychlor			1.00
	Methyl Isocyanate			1.00
	Methyl Tertiary Butyl Ether			1.00
	Methyl bromide			1.00
	Methyl chloride			0.89
	Methyl ethyl ketone			1.00
	Methyl isobutyl ketone			0.02
	Methyl methacrylate			1.00
	Methylene diphenyl diisocyanate			1.00
	Monomethyl hydrazine			1.00
	N,N-Diethyl aniline			1.00
	N,N-dimethylbenzenamine			1.00
	N-Nitroso-N-Methylurea			1.00
	N-Nitrosodimethylamine			1.00
	N-Nitrosomorpholine			1.00

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002 UNF02	Naphthalene (and Methyl naphthalenes)			0.60
	Nickel (and compounds)			0.038
	Nitric acid			0.14
	Nitrobenzene			0.19
	Parathion			1.00
	Pentachloronitrobenzene			1.00
	Phenol			0.18
	Phosgene			0.014
	Phosphine			1.00
	Phosphorus, Total (as P)			1.00
	Phthalic Anhydride			0.19
	Polychlorinated biphenyls			1.00
	Polynuclear Aromatic Hydrocarbons			0.012
	Propionaldehyde			0.34
	Propoxur			1.00
	Propylene			1.00
	Propylene oxide			0.34
	Propylenimine			1.00
	Pyridine			0.56
	Pyrocatechol			1.00
	Quinoline			1.00
	Quinone			1.00
	Selenium (and compounds)			0.056
	Styrene			0.60
	Sulfuric acid			42.38
	Tetrachloroethylene			0.64
	Titanium tetrachloride			1.00
	Toluene			1.01
	Toluene-2,4-diisocyanate			0.012
	Toluene-2,6-Diisocyanate			0.012
	Toxaphene			1.00
	Trichloroethylene			0.43
	Triethyl amine			1.00

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002 UNF02	Trifluralin			1.00
	Urethane			1.00
	Vinyl acetate			0.63
	Vinyl bromide			1.00
	Vinyl chloride			0.11
	Vinylidene chloride			0.58
	Xylene (mixed isomers)			1.01
	Zinc (and compounds)			0.22
	alpha-Chloroacetophenone			1.00
	beta-Propiolactone			1.00
	bis(2-ethylhexyl)phthalate			1.00
	bis(Chloromethyl)ether			1.00
	n-Hexane			1.01
	n-butyl alcohol			1.00
	o-Aminoanisole			1.00
	o-dianisidine			1.00
	ortho-Tolidine			1.00
	ortho-Toluidine			1.00
	p,p'-DDE			1.00
	para-Phenylenediamine			1.00
	pentachloro-Phenol			1.00

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Group: PCS 0001 Spent Acid Process

Group Members: ARE 0002 CRG 0003 EQT 0008 EQT 0150 EQT 0151 EQT 0161 EQT 0163 EQT 0164 EQT 0165 EQT 0167 EQT 0168 EQT 0169 EQT 0171 EQT 0176 EQT 0185 EQT 0277 FUG 0002 0004

ARE 0002 M4 - West End Sump

- 1 [LAC 33:III.5107.A.2] Emits Class III TAP (via process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

CRG 0003 CRG003 - Spent Acid Tanks

Group Members: EQT 0008 EQT 0161 EQT 0163 EQT 0164 EQT 0165 EQT 0169 EQT 0171

- 2 [40 CFR 60.110b(e)] Complies with 40 CFR 60 Subpart Kb by complying with 40 CFR 65 Subparts C and G. Monitoring requirements of 40 CFR 60.116b(c), (e), (f)(1), and (g) still apply. Subpart Kb. [40 CFR 60.110b(e)]
- 3 [40 CFR 65.145(c)(2)] Equipment/operational data monitored by technically sound method at the approved frequency. Monitor the disposition of spent acid tank vent (Sulfuric Acid Unit No. 1 versus APVC). Subpart G. [40 CFR 65.145(c)(2)]
- 4 [40 CFR 65.42(b)(5)] Which Months: All Year Statistical Basis: None specified
- Operate and maintain a closed vent system and a control device. Ensure that the control device is designed and operated to reduce inlet emissions of regulated material by 95% or greater, except during periods of planned routine maintenance or during a control system malfunction. Ensure that periods of planned routine maintenance do not exceed 240 hours per year. Subpart C. [40 CFR 65.42(b)(5)]
- 5 [40 CFR 65.47(b)] Equipment/operational data recordkeeping by electronic or hard copy once initially. Keep readily accessible records showing the dimensions of the storage vessel and an analysis of the capacity of the storage vessel. Keep records as long as the storage vessel is in operation. Subpart C. [40 CFR 65.47(b)]

CRG 0004 CRG004 - 99/Oleum/Spent Swing Tanks

Group Members: EQT 0167 EQT 0168

- 6 [40 CFR 60.110b(e)] Complies with 40 CFR 60 Subpart Kb by complying with 40 CFR 65 Subparts C and G. Monitoring requirements of 40 CFR 60.116b(c), (e), (f)(1), and (g) still apply. Subpart Kb. [40 CFR 60.110b(e)]
- 7 [40 CFR 65.145(c)(2)] Equipment/operational data monitored by technically sound method at the approved frequency. Monitor the disposition of spent acid tank vent (Sulfuric Acid Unit No. 1 versus APVC). Subpart G. [40 CFR 65.145(c)(2)]
- 8 [40 CFR 65.42(b)(5)] Which Months: All Year Statistical Basis: None specified
- Operate and maintain a closed vent system and a control device. Ensure that the control device is designed and operated to reduce inlet emissions of regulated material by 95% or greater, except during periods of planned routine maintenance or during a control system malfunction. Ensure that periods of planned routine maintenance do not exceed 240 hours per year. Subpart C. [40 CFR 65.42(b)(5)]
- 9 [40 CFR 65.47(b)] Equipment/operational data recordkeeping by electronic or hard copy once initially. Keep readily accessible records showing the dimensions of the storage vessel and an analysis of the capacity of the storage vessel. Keep records as long as the storage vessel is in operation. Subpart C. [40 CFR 65.47(b)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Group: PCS 0001 Spent Acid Process

CRG 0004 CRG004 - 99/Oleum/Spent Swing Tanks

- 10 [LAC 33:III.501.C.6] The requirements listed under CRG004 for the 99/Oleum/Spent Swing Tanks (EQT167 & EQT168) only apply when these tanks are in Spent Acid Service.

EQT 0150 26 - Spent Acid Barge Loading Scrubber

- 11 [LAC 33:III.501.C.6] pH recordkeeping by electronic or hard copy once every four hours when barge vents are routed to scrubber. Because this scrubber is a portable unit, permittee may occasionally move it and substitute a different scrubber unit. All specific requirements and emission limits will continue to apply. STATE ONLY.
- 12 [LAC 33:III.501.C.6] Pressure recordkeeping by electronic or hard copy once every four hours when barge vents are routed to scrubber. STATE ONLY.
- 13 [LAC 33:III.501.C.6] Pressure monitored by pressure instrument once every four hours when barge vents are routed to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 14 [LAC 33:III.501.C.6] Packed Column Spray Nozzle Pressure ≥ 15 psig when barge vents are routed to scrubber. Permittee is allowed one excused excursion per semi-annual period. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 15 [LAC 33:III.501.C.6] This scrubber is a portable unit, permittee may occasionally move it and substitute a different scrubber unit. All specific requirements and emission limits will continue to apply.
- 16 [LAC 33:III.501.C.6] pH ≥ 10 s.u. when barge vents are routed to scrubber. Permittee is allowed one excused excursion per semi-annual period. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 17 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 18 [LAC 33:III.501.C.6] pH monitored by pH instrument once every four hours when barge vent are routed to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 19 [LAC 33:III.5107.A.2] Emits Class III TAP (via process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. STATE ONLY.

EQT 0151 27 - Acid Plant Vapor Combustor

- 20 [40 CFR 65.145(a)] Temperature ≥ 1512 F when regulated tanks are venting to the APVC; or VOC, Total ≥ 95 % destruction removal efficiency (DRE) when calculated by time-weighted average factoring in the amount of time vented to Sulfuric Acid Unit No. 1 (RLP 014). Subpart G. [40 CFR 65.145(a)]
Which Months: All Year Statistical Basis: Daily average
- 21 [40 CFR 65.145(a)] The owner or operator shall operate and maintain the nonflare control device so that the monitored parameters defined in the monitoring plan remain within the ranges specified in the Initial Compliance Status Report whenever emissions of regulated material are routed to the control device, except during periods of startup, shutdown, and malfunction. Subpart G. [40 CFR 65.145(a)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Group: PCS 0001 Spent Acid Process

EQT 0151 27 - Acid Plant Vapor Combustor

- 22 [40 CFR 65.145(c)(1)] Submit a monitoring plan containing the information in 40 CFR 65.165(b) to identify the parameters that will be monitored to assure proper operation of the control device, unless previously established under an applicable standard prior to the implementation date of 40 CFR 65. Subpart G. [40 CFR 65.145(c)(1)]
- 23 [40 CFR 65.145(c)(2)] Temperature monitored by temperature monitoring device at the approved frequency. Monitor the firebox temperature. Subpart G. [40 CFR 65.145(c)(2)]
Which Months: All Year Statistical Basis: Daily average
- 24 [40 CFR 65.163] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 65.163(a) through (e), as applicable. Subpart G.
- 25 [40 CFR 65.5(c)] Submit Startup, Shutdown, and Malfunction Report: Due by the 30th day following the end of each calendar half (or other calendar reporting period, as appropriate), unless the information is submitted with the periodic report. Include the information specified in 40 CFR 65.6(c)(1) through (c)(4), as appropriate. Subpart A. [40 CFR 65.5(c)]
- 26 [40 CFR 65.5(e)] Submit Periodic Report: Due semiannually, no later than 60 calendar days after the end of each six-month period. Include all information specified in subparts of 40 CFR 65 and in 40 CFR 65.5(f). Subpart A. [40 CFR 65.5(e)]
- 27 [40 CFR 65.6(b)(1)] Develop a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the regulated source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard. Address routine or otherwise predictable CPMS malfunctions. Develop the plan by the regulated source's implementation date as specified in 40 CFR 65.1(f), or for sources referenced from 40 CFR 63 Subpart F, by the compliance date specified in 40 CFR 63 Subpart F. Subpart A. [40 CFR 65.6(b)(1)]
- 28 [LAC 33:III.1101.B] Opacity \leq 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified
- 29 [LAC 33:III.1311.C] Opacity \leq 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: Six-minute average
- 30 [LAC 33:III.5107.A.2] Emits Class III TAP (via this source and process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

EQT 0176 20D120/30D240 - IFS Mix Tank

- 31 [LAC 33:III.2103.A] Each tank, reservoir, or container with a capacity less than 40,000 gallons but more than 250 gallons storing any VOC with a vapor pressure greater than 1.5 psia shall be equipped with a submerged fill pipe or a vapor loss control system.
- 32 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20110006
Permit Number: 0840-00033-V4
Air - Title V Regular Permit Minor Mod

Group: PCS 0001 Spent Acid Process

EQT 0176 20D120/30D240 - IFS Mix Tank

- 33 [LAC 33:III.5107.A.2] Emits Class I and/or Class II and/or Class III TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

EQT 0185 M7 - 001 Wastewater Treatment Unit

- 34 [LAC 33:III.5107.A.2] Emits Class III TAP (via process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

EQT 0277 13 - Acid Plant Caustic Scrubber

- 35 [LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
- 36 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy once every 15 minutes only when venting to scrubber. STATE ONLY.
- 37 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device continuously only when venting to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 38 [LAC 33:III.501.C.6] pH \geq 7 s.u. when venting to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 39 [LAC 33:III.501.C.6] pH monitored by pH instrument continuously only when venting to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 40 [LAC 33:III.501.C.6] pH recordkeeping by electronic or hard copy once every 15 minutes only when venting to scrubber. STATE ONLY.
- 41 [LAC 33:III.501.C.6] Flow rate \geq 315 gallons/min when venting to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 42 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 43 [LAC 33:III.905] Install air pollution control facilities whenever practically, economically, and technologically feasible. When facilities have been installed on a property, use them and diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the facilities, even though the ambient air quality standards in affected areas are not exceeded.

FUG 0002 FUG-ACID - Acid Plant Fugitive Emissions

- 44 [40 CFR 65.143(a)(1)] Ensure that each closed vent system is designed and operated to collect the regulated material vapors from the emission point and to route the collected vapors to a control device. Subpart G. [40 CFR 65.143(a)(1)]
- 45 [40 CFR 65.143(a)(2)] Operate closed vent systems at all times when emissions are vented to them. Subpart G. [40 CFR 65.143(a)(2)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Group: PCS 0001 Spent Acid Process

FUG 0002 FUG-ACID - Acid Plant Fugitive Emissions

- 46 [40 CFR 65.143(a)(3)(ii)] Seal or closure mechanism monitored by visual inspection/determination monthly to ensure the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass line. Subpart G. [40 CFR 65.143(a)(3)(ii)]
Which Months: All Year Statistical Basis: None specified
- 47 [40 CFR 65.143(a)(3)(ii)] Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. Subpart G. [40 CFR 65.143(a)(3)(ii)]
- 48 [40 CFR 65.143(b)(1)(i)(A)] Closed vent system (hard piping): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency, as specified in 40 CFR 65.143(c). Subpart G. [40 CFR 65.143(b)(1)(i)(A)]
Which Months: All Year Statistical Basis: None specified
- 49 [40 CFR 65.143(b)(1)(i)(B)] Closed vent system (hard piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart G. [40 CFR 65.143(b)(1)(i)(B)]
Which Months: All Year Statistical Basis: None specified
- 50 [40 CFR 65.143(b)(1)(ii)] Closed vent system (ductwork): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once initially and annually, as specified in 40 CFR 65.143(c). Subpart G. [40 CFR 65.143(b)(1)(ii)]
Which Months: All Year Statistical Basis: None specified
- 51 [40 CFR 65.143(b)(2)(i)] Closed vent system (unsafe to inspect): Determine that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with 40 CFR 65.143(b)(1). Comply with this requirement instead of the requirements in 40 CFR 65.143(b)(1). Subpart G. [40 CFR 65.143(b)(2)(i)]
- 52 [40 CFR 65.143(b)(2)(ii)] Closed vent system (unsafe to inspect): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment as frequently as practicable during safe-to-monitor times but not more frequently than annually. Comply with this requirement instead of the requirements in 40 CFR 65.143(b)(1). Subpart G. [40 CFR 65.143(b)(2)(ii)]
Which Months: All Year Statistical Basis: None specified
- 53 [40 CFR 65.143(b)(3)(i)] Closed vent system (difficult to inspect): Determine that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters (7 feet) above a support surface. Comply with this requirement instead of the requirements in 40 CFR 65.143(b)(1). Subpart G. [40 CFR 65.143(b)(3)(i)]
- 54 [40 CFR 65.143(b)(3)(ii)] Closed vent system (difficult to inspect): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once every five years. Comply with this requirement instead of the requirements in 40 CFR 65.143(b)(1). Subpart G. [40 CFR 65.143(b)(3)(ii)]
Which Months: All Year Statistical Basis: None specified
- 55 [40 CFR 65.143(d)(1)] Closed vent system: Eliminate indications of a leak, or monitor the equipment according to the provisions in 40 CFR 65.143(c), if there are visible, audible or olfactory indications of leaks at the time of the annual visual inspections required by 40 CFR 65.143(b)(1)(i)(B). Subpart G. [40 CFR 65.143(d)(1)]
- 56 [40 CFR 65.143(d)(2)] Closed vent system: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after each leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later, except as specified in 40 CFR 65.143(d)(3). Subpart G. [40 CFR 65.143(d)(2)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Group: PCS 0001 Spent Acid Process

FUG 0002 FUG-ACID - Acid Plant Fugitive Emissions

- 57 [40 CFR 65.143(d)(3)] Closed vent system: Complete repairs as soon as practical, but not later than the end of the next closed vent system shutdown, if repair of a leak is technically infeasible without a closed vent system shutdown, or if it is determined that emissions from immediate repair would be greater than the emissions likely to result from delay of repair. Subpart G. [40 CFR 65.143(d)(3)]
- 58 [40 CFR 65.163] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 65.163(a) through (e), as applicable. Subpart G.
- 59 [LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
- 60 [LAC 33:III.5107.A.2] Emits Class III TAP (via this source and process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

Group: PCS 0002 TS Process

Group Members: ARE 0003 CRG 0001 CRG 0002 EQT 0147 EQT 0177 EQT 0178 EQT 0179 EQT 0180 EQT 0181 EQT 0182 EQT 0183 EQT 0278 EQT 0279 EQT 0280 EQT 0281 EQT 0282 EQT 0283 EQT 0284
FUG 0003 RLP 0013 RLP 0014

ARE 0003 M3 - Treatment Services Sumps

- 61 [LAC 33:III.5107.A.2] Emits Class III TAP (via process group PCS0002), and emits Class I and/or Class II TAP (via process group PCS0002) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

CRG 0001 CRG001 - 40D250, 40D280, and 40D200

Group Members: EQT 0177 EQT 0178 EQT 0180

- 62 [40 CFR 60.112b(a)(3)(i)] Closed vent system: Design to collect all VOC vapors and gases discharged from the storage vessel. Subpart Kb. [40 CFR 60.112b(a)(3)(i)]
- 63 [40 CFR 60.112b(a)(3)(ii)] VOC, Total $\geq 95\%$ reduction efficiency using a closed vent system and control device. Sulfuric Acid Unit No. 2 serves as the primary control device for these tanks. The TS Vapor Combustor serves as the secondary control device for these tanks. Subpart Kb. [40 CFR 60.112b(a)(3)(ii)]
- 64 [40 CFR 60.116b(b)] Which Months: All Year Statistical Basis: None specified
Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. Keep copies of all records for the life of the source as specified by 40 CFR 60.116b(a). Subpart Kb. [40 CFR 60.116b(b)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

CRG 0001 CRG001 - 40D250, 40D280, and 40D200

- 65 [40 CFR 61.343(a)(1)(i)(A)] Fixed roof: Ensure that the cover and all openings are designed to operate with no detectable emissions as indicated by an instrument reading less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h). (Method 21). Subpart FF. [40 CFR 61.343(a)(1)(i)(A)]
- 65 [40 CFR 61.343(a)(1)(i)(B)] Fixed roof: Maintain each opening in a closed, sealed position at all times that waste is in the tank except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair, except as specified in 40 CFR 61.343(a)(1)(i)(C). Subpart FF. [40 CFR 61.343(a)(1)(i)(B)]
- 67 [40 CFR 61.343(a)(1)] Install, operate, and maintain a fixed-roof and closed-vent system that routes all organic vapors vented from the tank to a control device. Subpart FF. [40 CFR 61.343(a)(1)]
- 68 [40 CFR 61.343(c)] Fixed-roof: Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter to ensure that no cracks or gaps occur and that access doors and other openings are closed and gasketed properly. Subpart FF. [40 CFR 61.343(c)]
Which Months: All Year Statistical Basis: None specified
- 69 [40 CFR 61.343(d)] Make first efforts at repair as soon as practicable, but not later than 45 calendar days after a broken seal or gasket or other problem is identified, or when detectable emissions are measured, except as provided in 40 CFR 61.350. Subpart FF. [40 CFR 61.343(d)]
- 70 [40 CFR 61.349(a)(1)(iii)] Closed-vent system: Ensure that all gauging and sampling devices are gas-tight except when gauging or sampling is taking place. Subpart FF. [40 CFR 61.349(a)(1)(iii)]
- 71 [40 CFR 61.355] Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.
- 72 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
- 73 [40 CFR 63.133(a)(2)(i)] Operate and maintain a fixed roof and a closed-vent system that routes the organic hazardous air pollutants vapors vented from the wastewater tank to a control device. Subpart G. [40 CFR 63.133(a)(2)(i)]
- 74 [40 CFR 63.133(b)(1)(i)] Fixed roof: Maintain in accordance with the requirements specified in 40 CFR 63.148, except as provided in 40 CFR 63.133(b)(4). Subpart G. [40 CFR 63.133(b)(1)(i)]
- 75 [40 CFR 63.133(b)(1)(ii)] Fixed roof: Maintain each opening in a closed position at all times that the wastewater tank contains a Group 1 wastewater stream or residual removed from a Group 1 wastewater stream except when it is necessary to use the opening for wastewater sampling, removal, or for equipment inspection, maintenance, or repair. Subpart G. [40 CFR 63.133(b)(1)(ii)]
- 76 [40 CFR 63.133(f)] Equipment/operational data monitored by technically sound method once initially and once every six months. Monitor for improper work practices in accordance with 40 CFR 63.143, except as specified in 40 CFR 63.133(e). Subpart G. [40 CFR 63.133(f)]
Which Months: All Year Statistical Basis: None specified
- 77 [40 CFR 63.133(g)] Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Inspect each wastewater tank for control equipment failures as defined in 40 CFR 63.133(g)(1)(i) through (g)(1)(ix) according to the schedule in 40 CFR 63.133(g)(2) and (g)(3). Subpart G. [40 CFR 63.133(g)]
Which Months: All Year Statistical Basis: None specified
- 78 [40 CFR 63.143(a)] Comply with the inspection requirements in 40 CFR 63 Subpart G Table 11. Subpart G. [40 CFR 63.143(a)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

CRG 0001 CRG001 - 40D250, 40D280, and 40D200

- 79 [LAC 33:III.2103.E.1] VOC, Total \geq 95 % control efficiency using a vapor loss control system. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
- 80 [LAC 33:III.2103.E] Which Months: All Year Statistical Basis: None specified
Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place. Routed to Sulfuric Acid Unit No. 2 or TS Vapr Combustor.
- 81 [LAC 33:III.2103.H.2] Determine compliance with LAC 33:III.2103.E using the methods in LAC 33:III.2103.H.2.a-e, where appropriate.
- 82 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

CRG 0002 CRG002 - 40D290, 40D210, 40D300, and 40D220

Group Members: EQT 0179EQT 0181EQT 0182EQT 0183

- 83 [40 CFR 61.343(a)(1)(i)(A)] Fixed roof: Ensure that the cover and all openings are designed to operate with no detectable emissions as indicated by an instrument reading less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h). (Method 21). Subpart FF. [40 CFR 61.343(a)(1)(i)(A)]
- 84 [40 CFR 61.343(a)(1)(i)(B)] Fixed roof: Maintain each opening in a closed, sealed position at all times that waste is in the tank except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair, except as specified in 40 CFR 61.343(a)(1)(i)(C). Subpart FF. [40 CFR 61.343(a)(1)(i)(B)]
- 85 [40 CFR 61.343(a)(1)] Install, operate, and maintain a fixed-roof and closed-vent system that routes all organic vapors vented from the tank to a control device. Subpart FF. [40 CFR 61.343(a)(1)]
- 86 [40 CFR 61.343(c)] Fixed-roof: Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter to ensure that no cracks or gaps occur and that access doors and other openings are closed and gasketed properly. Subpart FF. [40 CFR 61.343(c)]
Which Months: All Year Statistical Basis: None specified
- 87 [40 CFR 61.343(d)] Make first efforts at repair as soon as practicable, but not later than 45 calendar days after a broken seal or gasket or other problem is identified, or when detectable emissions are measured, except as provided in 40 CFR 61.350. Subpart FF. [40 CFR 61.343(d)]
- 88 [40 CFR 61.349(a)(1)(iii)] Closed-vent system: Ensure that all gauging and sampling devices are gas-tight except when gauging or sampling is taking place. Subpart FF. [40 CFR 61.349(a)(1)(iii)]
- 89 [40 CFR 61.355] Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.
- 90 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
- 91 [40 CFR 63.133(a)(1)] Operate and maintain a fixed roof. Subpart G. [40 CFR 63.133(a)(1)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

CRG 0002 CRG002 - 40D290, 40D210, 40D300, and 40D220

- 92 [40 CFR 63.133(f)] Equipment/operational data monitored by technically sound method once initially and once every six months. Monitor for improper work practices in accordance with 40 CFR 63.143, except as specified in 40 CFR 63.133(e). Subpart G. [40 CFR 63.133(f)]
Which Months: All Year Statistical Basis: None specified
- 93 [40 CFR 63.133(g)] Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Inspect each wastewater tank for control equipment failures as defined in 40 CFR 63.133(g)(1)(i) through (g)(1)(ix) according to the schedule in 40 CFR 63.133(g)(2) and (g)(3). Subpart G. [40 CFR 63.133(g)]
Which Months: All Year Statistical Basis: None specified
- 94 [40 CFR 63.143(a)] Comply with the inspection requirements in 40 CFR 63 Subpart G Table 11. Subpart G. [40 CFR 63.143(a)]
- 95 [LAC 33:III.2103.A] Each tank, reservoir, or container with a capacity less than 40,000 gallons but more than 250 gallons storing any VOC with a vapor pressure greater than 1.5 psia shall be equipped with a submerged fill pipe or a vapor loss control system.
- 96 [LAC 33:III.2103.H.3] If required, Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 97 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0147 21 - TS Vapor Combustor

- 98 [40 CFR 60.112b(a)(3)(ii)] VOC, Total \geq 95 % reduction efficiency using a closed vent system and control device. Subpart Kb. [40 CFR 60.112b(a)(3)(ii)]
Which Months: All Year Statistical Basis: Three-hour average
- 99 [40 CFR 60.113b(c)(2)] Equipment/operational data monitored by the regulation's specified method(s) at the regulation's specified frequency. Monitor the parameters of the closed vent system and control device in accordance with the operating plan submitted to DEQ in accordance with 40 CFR 60.113b(c)(1) of this section, unless the plan was modified by DEQ during the review process. In this case, the modified plan applies. Therefore, monitor firebox temperature continuously. Subpart Kb. [40 CFR 60.113b(c)(2)]
Which Months: All Year Statistical Basis: None specified
- 100 [40 CFR 60.115b(c)(1)] Operating plan recordkeeping by electronic or hard copy at the approved frequency. Keep copies of all records for the life of the control equipment. Subpart Kb. [40 CFR 60.115b(c)(1)]
- 101 [40 CFR 60.115b(c)(2)] Monitoring data recordkeeping by electronic or hard copy upon measurement in accordance with the operating plan of 40 CFR 60.113b(c)(2). Keep copies of all records for at least two years. Subpart Kb. [40 CFR 60.115b(c)(2)]
- 102 [40 CFR 61.349(a)(2)(i)(C)] Residence time \geq 0.5 sec at a minimum temperature of 760 degrees C (1400 degrees F). Subpart FF. [40 CFR 61.349(a)(2)(i)(C)]
Which Months: All Year Statistical Basis: None specified
- 103 [40 CFR 61.349(f)] Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter. Include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections. Subpart FF. [40 CFR 61.349(f)]
Which Months: All Year Statistical Basis: None specified
- 104 [40 CFR 61.354(c)(1)] Temperature monitored by temperature monitoring device continuously. Install the temperature sensor at a representative location in the combustion chamber. Subpart FF. [40 CFR 61.354(c)(1)]
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

EQT 0147 21 - TS Vapor Combustor

- 105 [40 CFR 61.354(c)] Inspect the firebox temperature results daily to ensure proper operation. Subpart FF. [40 CFR 61.354(c)]
- 106 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
- 107 [40 CFR 63.139(b)] Ensure that the control device is operating whenever organic hazardous air pollutants emissions are vented to the control device. Subpart G. [40 CFR 63.139(b)]
- 108 [40 CFR 63.139(c)(1)(iii)] Residence time ≥ 0.5 sec at a minimum temperature of 760 degrees C. The TS Vapor Combustor is the secondary control device for TS tanks that are subject to vapor control per 63.133(a)(2) if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.139(c)(1)(iii)]
Which Months: All Year Statistical Basis: None specified
- 109 [40 CFR 63.139(d)] Demonstrate that each control device or combination of control devices achieves the appropriate conditions specified in 40 CFR 63.139(c) by using one or more of the methods specified in 40 CFR 63.138(d)(1), (d)(2), or (d)(3), except as specified in (d)(4). Subpart G. [40 CFR 63.139(d)]
- 110 [40 CFR 63.143(e)(1)] Comply with the monitoring requirements specified in 40 CFR 63 Subpart G Table 13. Continuously monitor the firebox temperature. Subpart G. [40 CFR 63.143(e)(1)]
- 111 [40 CFR 63.143(g)] The firebox temperature monitoring equipment shall be installed, calibrated, and maintained according to manufacturer's specifications or other written procedures that provide adequate assurance that the equipment will monitor accurately. Subpart G. [40 CFR 63.143(g)]
- 112 [LAC 33:III.1101.B] Opacity ≤ 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified
- 113 [LAC 33:III.1311.C] Opacity ≤ 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: Six-minute average
- 114 [LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
- 115 [LAC 33:III.2103.E.1] VOC, Total ≥ 95 % control efficiency. Vapor loss control system shall be capable of minimum VOC control efficiency of 95%. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: Three-hour average
- 116 [LAC 33:III.2103.H.2] Determine compliance with LAC 33:III.2103.E using the methods in LAC 33:III.2103.H.2.a-e, where appropriate.
- 117 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 118 [LAC 33:III.5107.A.2] Emits Class III TAP (via this source and process group PCS0002), and emits Class I and/or Class II TAP (via process group PCS0002) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

EQT 0278 U1-Scbr - Unit 1 Tail Gas Scrubber

- 119 [LAC 33:III.905] Install air pollution control facilities whenever practically, economically, and technologically feasible. When facilities have been installed on a property, use them and diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the facilities, even though the ambient air quality standards in affected areas are not exceeded.

EQT 0279 U2-Scbr - Unit 2 Tail Gas Scrubber

- 120 [LAC 33:III.905] Install air pollution control facilities whenever practically, economically, and technologically feasible. When facilities have been installed on a property, use them and diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the facilities, even though the ambient air quality standards in affected areas are not exceeded.

EQT 0280 U1-Furn - Unit 1 Furnace

- 121 [40 CFR 61.342(c)(1)(i)] Waste streams containing benzene: Remove or destroy the benzene contained in the waste using a treatment process or wastewater treatment system that complies with the standards specified in 40 CFR 61.348. Subpart FF. [40 CFR 61.342(c)(1)(i)]
- 122 [40 CFR 61.348(e)] Maintain furnace pressure at -0.1 inches of water maximum, 10-second delay. Furnace openings shall operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in §61.355(h). Compliance with this requirement assures compliance with 40 CFR 61.348(e). [40 CFR 61.348(e), LAC 33:III.507.H.1.a]
- 123 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
- 124 [40 CFR 63.138(h)(2)(i)] Treat the wastewater stream or residual in a unit identified in, and complying with, 40 CFR 63.138(h)(1), (h)(2), or (h)(3). Rhodia will comply with (h)(2) which states a boiler or heater that has been issued a final permit under 40 CFR 270 and complies with 40 CFR 266 Subpart H. Subpart G. [40 CFR 63.138(h)(2)(i)]
- 125 [40 CFR 65.145(a)] The owner or operator shall operate and maintain the nonflare control device so that the monitored parameters defined in the monitoring plan remain within the ranges specified in the Initial Compliance Status Report whenever emissions of regulated material are routed to the control device, except during periods of startup, shutdown, and malfunction. Subpart G. [40 CFR 65.145(a)]
- 126 [40 CFR 65.145(c)(1)] Temperature ≥ 1500 F when spent acid tanks are venting to Sulfuric Acid Unit No. 1. Subpart G. [40 CFR 65.145(c)(1)]
- 127 [40 CFR 65.145(c)(1)] Which Months: All Year Statistical Basis: None specified
- 127 [40 CFR 65.145(c)(1)] Submit a monitoring plan containing the information in 40 CFR 65.165(b) to identify the parameters that will be monitored to assure proper operation of the control device, unless previously established under an applicable standard prior to the implementation date of 40 CFR 65. Subpart G. [40 CFR 65.145(c)(1)]
- 128 [40 CFR 65.145(c)(2)] The owner or operator shall monitor the parameters specified in the Initial Compliance Status Report or in the operating permit. Therefore, Combustion zone temperature shall be monitored. Records shall be generated as specified in 65.163(b)(1). [40 CFR 65.145(c)(2)]
- 129 [40 CFR 65.163] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 65.163(a) through (e), as applicable. Subpart G.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

EQT 0280 U1-Furn - Unit 1 Furnace

- 130 [LAC 33:III.1101.B] Opacity \leq 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified

EQT 0281 U2-RFurn - Unit 2 Regen Furnace

- 131 [40 CFR 60.112b(a)(3)(ii)] VOC, Total \geq 95 % reduction efficiency. Subpart Kb. [40 CFR 60.112b(a)(3)(ii)]
Which Months: All Year Statistical Basis: Three-hour average
- 132 [40 CFR 60.113b(c)(2)] Equipment/operational data monitored by the regulation's specified method(s) continuously. Monitor the parameters of the closed vent system and control device in accordance with the operating plan submitted to DEQ in accordance with 40 CFR 60.113b(c)(1) of this section, unless the plan was modified by DEQ during the review process. In this case, the modified plan applies. Therefore, monitor firebox temperature (Regen furnace) continuously. Subpart Kb. [40 CFR 60.113b(c)(2)]
Which Months: All Year Statistical Basis: None specified
- 133 [40 CFR 60.115b(c)(1)] Operating plan recordkeeping by electronic or hard copy at the approved frequency. Keep copies of all records for the life of the control equipment. Subpart Kb. [40 CFR 60.115b(c)(1)]
- 134 [40 CFR 60.115b(c)(2)] Monitoring data recordkeeping by electronic or hard copy upon measurement in accordance with the operating plan of 40 CFR 60.113b(c)(2). Keep copies of all records for at least two years. Subpart Kb. [40 CFR 60.115b(c)(2)]
- 135 [40 CFR 61.342(c)(1)(i)] Waste streams containing benzene: Remove or destroy the benzene contained in the waste using a treatment process or wastewater treatment system that complies with the standards specified in 40 CFR 61.348. Subpart FF. [40 CFR 61.342(c)(1)(i)]
- 136 [40 CFR 61.348(e)] Maintain furnace pressure at -0.1 inches of water maximum, 10-second delay. Furnace openings shall operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in §61.355(h). Compliance with this requirement assures compliance with 40 CFR 61.348(e). [40 CFR 61.348(e), LAC 33:III.507.H.1.a]
- 137 [40 CFR 61.349(a)(2)(i)(C)] Residence time \geq 0.5 sec at a minimum temperature of 760 degrees C (1400 degrees F) in the Regen furnace. Subpart FF. [40 CFR 61.349(a)(2)(i)(C)]
Which Months: All Year Statistical Basis: None specified
- 138 [40 CFR 61.349(f)] Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter. Include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections. Subpart FF. [40 CFR 61.349(f)]
Which Months: All Year Statistical Basis: None specified
- 139 [40 CFR 61.354(c)(5)] Equipment/operational data monitored by technically sound method continuously. Monitor a parameter that indicates good combustion operating practices are being used. Subpart FF. [40 CFR 61.354(c)(5)]
Which Months: All Year Statistical Basis: None specified
- 140 [40 CFR 61.354(c)(5)] Equipment/operational data recordkeeping by recorder continuously. Record a parameter that indicates good combustion operating practices are being used. Subpart FF. [40 CFR 61.354(c)(5)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

EQT 0281 U2-RFurn - Unit 2 Regen Furnace

- 141 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
- 142 [40 CFR 63.138(h)(2)(i)] Treat the wastewater stream or residual in a unit identified in, and complying with, 40 CFR 63.138(h)(1), (h)(2), or (h)(3). Rhodia will comply with (h)(2) which states a boiler or heater that has been issued a final permit under 40 CFR 270 and complies with 40 CFR 266 Subpart H. Subpart G. [40 CFR 63.138(h)(2)(i)]
- 143 [40 CFR 63.139(c)(1)(iii)] Route organic hazardous air pollutant emissions to an enclosed combustion device having a minimum Residence time ≥ 0.5 sec at a minimum temperature of 760 degrees C. Unit No. 2 Regen furnace is the primary control device for TS tanks that are subject to vapor control per 63.133(a)(2) if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to us. Per 63.139(d)(4)(iii)(A), this unit is exempt from 63.139(d)(1)-(3) and 63.143. Subpart G. [40 CFR 63.139(c)(1)(iii)]
Which Months: All Year Statistical Basis: None specified
- 144 [LAC 33:III.1101.B] Opacity ≤ 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified
- 145 [LAC 33:III.2103.E.1] VOC, Total ≥ 95 % control efficiency. Vapor loss control system shall be capable of minimum VOC control efficiency of 95% for compliance of all tanks vented to it. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: Three-hour average
- 146 [LAC 33:III.2103.H.2] Determine compliance with LAC 33:III.2103.E using the methods in LAC 33:III.2103.H.2.a-e, where appropriate.
- 147 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0282 U2-SFurn - Unit 2 Sulfur Furnace

- 148 [LAC 33:III.1101.B] Opacity ≤ 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified

EQT 0283 U1-Proc - Unit 1 Process

- 149 [LAC 33:III.1511.E] Production of Sulfuric acid monitored by technically sound method daily. Monitor the H₂SO₄ production rate.
Which Months: All Year Statistical Basis: None specified
- 150 [LAC 33:III.1513.A.3] Production of Sulfuric acid recordkeeping by electronic or hard copy daily. Record the H₂SO₄ production rate.
- 151 [LAC 33:III.5109.A.1] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. MACT applies for metals only and therefore is determined to be compliance with the BIF permit.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

EQT 0284 U2-Proc - Unit 2 Process

- 152 [LAC 33:III.1511.E] Sulfuric acid monitored by technically sound method daily. Monitor the H₂SO₄ production rate.
Which Months: All Year Statistical Basis: None specified
- 153 [LAC 33:III.1513.A.3] Sulfuric acid recordkeeping by electronic or hard copy daily. Record the H₂SO₄ production rate.
- 154 [LAC 33:III.5109.A.1] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ.
MACT applies for metals only and therefore is determined to be compliance with the BIF permit.

FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

- 155 [40 CFR 60.112b(a)(3)(i)] Closed vent system (no detectable emissions): VOC, Total < 500 ppm above background as indicated by instrument readings and visual inspections, as determined in Subpart VV, 40 CFR 60.485(c). Subpart Kb. [40 CFR 60.112b(a)(3)(i)]
Which Months: All Year Statistical Basis: None specified
- 156 [40 CFR 60.112b(a)(3)] Equip with a closed vent system and control device. Design the closed vent system to collect all VOC vapors and gases discharged from the storage vessel and operate with no detectable emissions. Subpart Kb. [40 CFR 60.112b(a)(3)]
- 157 [40 CFR 61.343(a)(1)(i)(A)] Fixed roof: Ensure that the cover and all openings are designed to operate with no detectable emissions as indicated by an instrument reading less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h). Subpart FF. [40 CFR 61.343(a)(1)(i)(A)]
- 158 [40 CFR 61.345(a)(1)] Install, operate, and maintain a cover on each container used to handle, transfer, or store waste. Subpart FF. [40 CFR 61.345(a)(1)]
- 159 [40 CFR 61.348(e)(3)ii] If the cover and closed-vent system operates such that the treatment process and wastewater treatment system unit are maintained at a pressure less than atmospheric pressure, the owner or operator may operate the system with an opening that is not sealed and kept closed at all times provided the opening is designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 61.355(h). Subpart FF. [40 CFR 61.348(e)(3)ii]
- 160 [40 CFR 61.349(a)(1)(i)] Closed-vent system: Operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h). Subpart FF. [40 CFR 61.349(a)(1)(i)]
- 161 [40 CFR 61.349(f)] Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter. Include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections. Subpart FF. [40 CFR 61.349(f)]
Which Months: All Year Statistical Basis: None specified
- 162 [40 CFR 61.354(f)(1)] Closed-vent system (bypass line): Seal or closure mechanism monitored by visual inspection/determination monthly. Check the position of the valve and the condition of the car-seal or closure mechanism required under 40 CFR 61.349(a)(1)(ii) to ensure that the valve is maintained in the closed position and the vent stream is not diverted through the bypass line. Subpart FF. [40 CFR 61.354(f)(1)]
Which Months: All Year Statistical Basis: None specified
- 163 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

- 164 [40 CFR 63.148(c)(1)] Conduct initial inspection of closed vent system on TS tanks in accordance with Method 21 as specified in 40 CFR 63.148(c)(1). Conduct annual inspection for visible, audible, or olfactory indications of leaks. This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(c)(1)]
- 165 [40 CFR 63.148(f)(2)] Vapor collection system or closed vent system (bypass lines): Seal or closure mechanism monitored by visual inspection/determination monthly to ensure the valve is maintained in the closed position and the vent stream is not diverted through the bypass line. This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(f)(2)]
Which Months: All Year Statistical Basis: None specified
- 166 [40 CFR 63.148(f)(2)] Vapor collection system or closed vent system (bypass lines): Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(f)(2)]
- 167 [40 CFR 63.148(i)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.148(i)(1) through (i)(6). This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(i)]
- 168 [40 CFR 63.148(j)] Submit the information specified in 40 CFR 63.148(j)(1) through (j)(3) with the reports required by 40 CFR 63.182(b) of subpart H or 40 CFR 63.152(c). This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(j)]
- 169 [LAC 33:III.501] Comply with 40 CFR 264 BB and 40 CFR 61 Subpart V by implementing the Louisiana Consolidated Fugitive Emission Program Guidelines. Compliance is achieved through compliance with LA MACT Determination for nonHON Sources.
- 170 [LAC 33:III.5107.A.2] Emits Class III TAP (via process group PCS0002), and emits Class I and/or Class II TAP (via process group PCS0002) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
- 171 [LAC 33:III.5109.A] VOC, Total monitored by technically sound method within 90 days of placing equipment back in service that had been physically removed from service, disassembled or dismantled to determine if it is leaking, as specified in Subsection C.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
Which Months: All Year Statistical Basis: None specified
- 172 [LAC 33:III.5109.A] Pressure relief device in gas/vapor service: VOC, Total < 500 ppm except during pressure releases, as measured by the method specified in Section P.3, as specified in Section F.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
Which Months: All Year Statistical Basis: None specified
- 173 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service (percent leaking valves ≤ 2 for two consecutive semiannual leak detection periods): VOC, Total monitored by the regulation's specified method(s) annually, as specified in Paragraph J.2.b of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Monitor using the method specified in Section P. If the percentage of valves leaking is greater than 2 for any monitoring period, comply with the requirements as described in Section I, as specified in Paragraph J.2.c of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Optional alternative to quarterly monitoring.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

- 174 [LAC 33:III.5109.A] Comply with the test methods and procedures in Section P, as specified in Subsections P.1 through P.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 175 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service (opened or otherwise had the seal broken): VOC, Total monitored by the regulation's specified method(s) within 90 days after being returned to VOTAP service. Monitor each connector that has been opened or has otherwise had the seal broken, including those determined to be unrepairable prior to process unit shutdown, as specified in Paragraph O.8.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Section P. If the follow-up monitoring detects a leak, initiate repair provisions specified in Subsection O.9, unless it is determined to be unrepairable, in which case it is counted as unrepairable.
Which Months: All Year Statistical Basis: None specified
- 176 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Ensure that the barrier fluid is not in VOTAP service and, if the pump is covered by standards under NSPS, is not in VOC service, as specified in Paragraph D.4.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
- 177 [LAC 33:III.5109.A] Delay of Repair: Repair equipment before the end of the next process unit shutdown, if repair is technically infeasible without a process unit shutdown, as specified in Subsection M.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 178 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Equip each barrier fluid system with a sensor that will detect failure of the seal system, the barrier fluid system, or both, as specified in Paragraph D.4.c of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
- 179 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service (welded completely around the circumference of the interface or physically removed and the pipe welded together): Equipment/operational data monitored by the regulation's specified method(s) within three months after being welded. Check the integrity of the weld by monitoring according to the procedures in Section P or by testing using x-ray, acoustic monitoring, hydrotesting, or other applicable method, as specified in Subsection O.7 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection O.
Which Months: All Year Statistical Basis: None specified
- 180 [LAC 33:III.5109.A] Instrument systems and pressure relief devices in liquid service; and pumps, valves, connectors, and agitators in heavy liquid service: VOC, Total monitored by the regulation's specified method(s) within 5 days of finding evidence of a potential leak by visual, audible, olfactory, or any other detection method, as specified in Section K.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.2. If an instrument reading of 10000 ppm or greater for agitators, 2000 ppm or greater for pumps or 1000 ppm or greater for valves, connectors, instrument systems, or pressure relief devices is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection K.3.
Which Months: All Year Statistical Basis: None specified
- 181 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service: Repair Leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Subsection O.8. Make a first attempt at repair no later than 5 calendar days after each leak is detected. If a leak is detected, monitor the for leaks within the first 90 days after its repair, as specified in Subsection O.9 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

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- 182 [LAC 33:III.5109.A] Pressure relief device in gas/vapor service: After each pressure release, return to a condition of no leakage, as indicated by an instrument reading of less than 500 ppm, as soon as practicable, but no later than five calendar days after each pressure release, except as provided in Section M, as specified in Section F.2.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 183 [LAC 33:III.5109.A] Identify each piece of equipment in a process unit subject to this MACT determination such that it can be distinguished readily from equipment that is not subject to this MACT determination, as specified in Subsection C.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 184 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service (skip period leak detection and repair): Notify DEQ 30 days before implementing any of the alternate provisions of Section J, as specified in Subsection R.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 185 [LAC 33:III.5109.A] Sampling connection systems: Equip with a closed-purge system or closed-vent system, except as provided in Section C, as specified in Subsection G.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Ensure that this system collects or captures the sample purge for return to the process.
- 186 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service (percent of leaking connectors > 2): VOC, Total monitored by the regulation's specified method(s) quarterly until good performance is obtained or until four quarterly monitorings have been performed, as specified in Subsections O.2 and O.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If good performance has not been obtained after four quarters of monitoring, monitor the remaining unchecked connectors within six months of the last quarterly monitoring period, as specified in Subsection O.6 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If monitoring of the remaining connectors indicates good performance, monitor in accordance with Subsection O.4. If monitoring of the remaining connectors indicates that good performance has not been obtained, monitor in accordance with Subsection O.5. Monitor using the method specified in Section P. If an instrument reading ≥ 1000 ppm is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection O.9, except as provided in Section M.
Which Months: All Year Statistical Basis: None specified
- 187 [LAC 33:III.5109.A] Pumps in light liquid service: Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection D.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.
- 188 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service: Calculate the percent leaking connectors using the equation in Subsection O.12 for use in determining the monitoring frequency, as specified in Subsection O.12 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 189 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar), as specified in Paragraph D.4.d of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate repair provisions specified in Paragraphs D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

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- 190 [LAC 33:III.5109.A] Pumps in light liquid service: VOC, Total monitored by the regulation's specified method(s) quarterly. Monitor to detect leaks using the methods specified in Subsection P.2, except as provided in Subsection C.4 and Subsections D.4, D.5, and D.6, as specified in Paragraph D.1.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If an instrument reading of 2000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate repair provisions as specified in Subsection D.3.
Which Months: All Year Statistical Basis: None specified
- 191 [LAC 33:III.5109.A] Instrument systems and pressure relief devices in liquid service; and pumps, valves, connectors, and agitators in heavy liquid service: Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection K.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.
- 192 [LAC 33:III.5109.A] Submit report: Due semiannually starting six months after the initial report required in Subsection R.1. Include the information specified in Paragraphs R.2.a through R.2.e, as specified in Subsection R.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 193 [LAC 33:III.5109.A] Open-ended valves or lines: Monitor and repair in accordance with Section I, as specified in Subsection H.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 194 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Equipment/operational data monitored by visual inspection/determination daily, if pump is in service. Check sensor daily or equip with an audible alarm, as specified in Subparagraph D.4.e.i of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criterion determined in Paragraph D.4.e.ii, a leak is detected. If a leak is detected, initiate repair provisions specified in Paragraphs D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1.
Which Months: All Year Statistical Basis: None specified
- 195 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service (difficult-to-monitor): VOC, Total monitored by the regulation's specified method(s) at the regulation's specified frequency. Maintain a written plan that requires monitoring of the valve at least once per calendar year, as specified in Subsection I.6.c of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.2. Comply with this requirement instead of the requirements in Subsection I.1.
Which Months: All Year Statistical Basis: None specified
- 196 [LAC 33:III.5109.A] VOC, Total recordkeeping by logbook within 90 days of placing equipment back in service that had been physically removed from service, disassembled or dismantled. Maintain records as required in Subsection Q.5, as specified in Subsection C.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 197 [LAC 33:III.5109.A] Open-ended valves or lines: Equip with a cap, blind flange, plug, or a second valve that seals the open end at all times except during operations requiring process fluid flow through the open-ended valve or line or during maintenance and repair, as specified in Subsection H.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

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Group: PCS 0002 TS Process

FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

- 198 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service (percent of leaking connectors ≤ 2): VOC, Total monitored by the regulation's specified method(s) annually, as specified in Subsections O.2 and O.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Annual monitoring shall be performed per the Louisiana Fugitive Emission Program Consolidation Guidelines which states as once every four quarters. Monitor using the method specified in Section P. If an instrument reading ≥ 1000 ppm is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection O.9, except as provided in Section M.
Which Months: All Year Statistical Basis: None specified
- 199 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar), if pump is in service, as specified in Paragraph D.4.d of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate repair provisions specified in Paragraphs D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1.
Which Months: All Year Statistical Basis: None specified
- 200 [LAC 33:III.5109.A] Pressure relief device in gas/vapor service: VOC, Total monitored by the regulation's specified method(s) within 5 days (calendar) after the pressure release to confirm the condition of no leakage, as indicated by an instrument reading of less than 500 ppm above background, as specified in Section F.2.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.3.
Which Months: All Year Statistical Basis: None specified
- 201 [LAC 33:III.5109.A] Open-ended valves or lines (equipped with a second valve): Operate in a manner such that the valve on the process fluid end is closed before the second valve is closed, as specified in Subsection H.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 202 [LAC 33:III.5109.A] Sampling connection systems (closed-purge or closed-vent system): Return the purged process fluid directly to the process line with zero VOTAP emissions to the atmosphere, or collect and recycle the purged process fluid with zero VOTAP emissions to the atmosphere, or be designed and operated to capture and transport all the purged process fluid to a control device that complies with the requirements of Section N, as specified in Subsection G.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 203 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service (difficult-to-monitor): Demonstrate that the valve cannot be monitored without elevating the monitoring personnel more than two meters above a support service, as specified in Subsection I.6.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection I.1.
- 204 [LAC 33:III.5109.A] Attach a weatherproof and readily visible identification, marked with the equipment identification, to leaking equipment, as specified in Subsection Q.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 205 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both, as specified in Subparagraph D.4.e.ii of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
- 206 [LAC 33:III.5109.A] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in Subsections Q.1 through Q.13 as applicable, as specified in Section Q of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

- 207 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service (percent leaking valves ≥ 4): VOC, Total monitored by the regulation's specified method(s) monthly, as specified in Subsection I.7 of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Monitor using the method specified in Subsection P.2. Initiate monthly monitoring within 60 days of the previous monitoring and continue until the percent of leaking valves is less than 4, at which time monitoring can be performed in accordance with Subsection I.1.
Which Months: All Year Statistical Basis: None specified
- 208 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service: Repair leaks as soon as practicable, but no later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection I.3 and I.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.
- 209 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure, or equip with a barrier fluid degassing reservoir that is connected by a closed-vent system to a control device that complies with the requirements of Section N, or equip with a system that purges the barrier fluid into a process stream with zero VOTAP emissions to the atmosphere, as specified in Paragraph D.4.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.

RLP 0013 2 - Sulfuric Acid Unit No. 2

- 210 [40 CFR 60.83(a)(1)] Acid mist ≤ 0.15 lb/ton (0.075 kg/metric ton) of acid produced, expressed as H₂SO₄, the production being expressed as 100% H₂SO₄.
Subpart H. [40 CFR 60.83(a)(1)]
Which Months: All Year Statistical Basis: None specified
- 211 [40 CFR 60.83(a)(2)] Opacity < 10 percent. Subpart H. [40 CFR 60.83(a)(2)]
Which Months: All Year Statistical Basis: None specified
- 212 [40 CFR 60.85(a)] Use as reference methods and procedures the test methods in 40 CFR 60 Appendix A or other methods and procedures as specified in 40 CFR 60.85, except as provided in 40 CFR 60.8(b), in conducting the performance tests required in 40 CFR 60.8. Subpart H. [40 CFR 60.85(a)]
- 213 [40 CFR 60.85(b)] Determine compliance with the SO₂, acid mist, and visible emission standards in 40 CFR 60.82 and 60.83 using the test methods and procedures specified in 40 CFR 60.85(b) and (c), as applicable. Subpart H. [40 CFR 60.85(b)]
- 214 [40 CFR 60.Subpart H] Shall meet a 365-day rolling average limit of 2.2 lbs. of SO₂ per ton of 100% sulfuric acid produced, averaged over all operating hours in a rolling 365-day period. This limit applies at all times, including periods of startup, shutdown and malfunction. Operating hours are defined as all periods when sulfur-bearing compounds, except natural gas and fuel oil, are fed to the furnace. (Commence monitoring on January 1, 2011 and demonstrate compliance by January 1, 2012.)
Which months: All year Statistical Basis: 365-day rolling average.
- 215 [40 CFR 60.Subpart H] Rhodia shall comply with the monitoring requirements for SO₂ set forth in 40 CFR 60 Subpart A, Subpart H, Appendix B, and Appendix F, except where superseded by the Alternative Monitoring Plan approved by EPA and LDEQ on July 23, 2007.
- 216 [40 CFR 60.Subpart H] Shall meet a limit of 3.0 lbs SO₂/ton, expressed as lbs. of SO₂ emissions per ton of 100% sulfuric acid produced, averaged over each rolling 3-hour period. This limit does not apply during periods of Startup, Shutdown or Malfunction. For the purposes of this requirement, startup and shutdown are defined as follows. Startup is the 24-hour period when the sulfur-bearing feed starts after a main gas blower shutdown. Shutdown is the stopping of operation for any reason, beginning at the time sulfur-bearing feeds (except for natural gas and fuel oil) to the furnace cease.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

RLP 0013 2 - Sulfuric Acid Unit No. 2

- 217 [40 CFR 60.Subpart H] Rhodia shall comply with the recordkeeping requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A, Subpart H and Appendix F.
- 218 [40 CFR 60.Subpart H] Rhodia shall comply with the reporting requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A, Subpart H, Appendix B and Appendix F.
- 219 [LAC 33:III.501.C.6] Rhodia shall install continuous emission monitors (CEMs) for NOx as part of the debottlenecking project. STATE ONLY.
- 220 [LAC 33:III.5107.A.2] Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

RLP 0014 3 - Sulfuric Acid Unit No. 1

- 221 [40 CFR 60.83(a)(1)] Acid mist \leq 0.15 lb/ton (0.075 kg/metric ton) of acid produced, expressed as H₂SO₄, the production being expressed as 100% H₂SO₄. Subpart H. [40 CFR 60.83(a)(1)]
Which Months: All Year Statistical Basis: None specified
- 222 [40 CFR 60.83(a)(2)] Opacity < 10 percent. Subpart H. Effective starting on May 1, 2012. [40 CFR 60.83(a)(2)]
Which Months: All Year Statistical Basis: None specified
- 223 [40 CFR 60.85(a)] Effective May 1, 2012, use as reference methods and procedures the test methods in 40 CFR 60 Appendix A or other methods and procedures as specified in 40 CFR 60.85, except as provided in 40 CFR 60.8(b), in conducting the performance tests required in 40 CFR 60.8. Subpart H. [40 CFR 60.85(a)]
- 224 [40 CFR 60.85(b)] Effective May 1, 2012, determine compliance with the SO₂, acid mist, and visible emission standards in 40 CFR 60.82 and 60.83 using the test methods and procedures specified in 40 CFR 60.85(b) and (c), as applicable. Subpart H. [40 CFR 60.85(b)]
- 225 [40 CFR 60.Subpart H] Effective May 1, 2012, Rhodia will comply with the reporting requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A, Subpart H, Appendix B and Appendix F.
- 226 [40 CFR 60.Subpart H] Effective May 1, 2012, meet a 365-day rolling average limit of 1.9 lbs. of SO₂ per ton of 100% sulfuric acid produced, averaged over all operating hours in a rolling 365-day period. This limit applies at all times, including periods of startup, shutdown and malfunction. Operating hours are defined as all periods when sulfur-bearing compounds, except natural gas and fuel oil, are fed to the furnace. (Commence monitoring on May 1, 2012 and demonstrate compliance by May 1, 2013.)
Which months: All year Statistical Basis: 365-day rolling average.
- 227 [40 CFR 60.Subpart H] Conduct a SO₂ Performance Test by August 29, 2012, to demonstrate compliance with the 3-hour average SO₂ emissions limit. Such test must consist of at least 9 runs and be conducted pursuant to 40 CFR Part 60, Appendix A, Reference Method 8 and Appendix B, Performance Specification 2. This can serve as the CEMS relative accuracy test required under Performance Specification 2, and as applicable, the required NSPS performance test under 40 CFR 60.8.
- 228 [40 CFR 60.Subpart H] Effective May 1, 2012, Rhodia will comply with the monitoring requirements for SO₂ set forth in 40 CFR 60 Subpart A, Subpart H, Appendix B, and Appendix F, except where superseded by the Alternative Monitoring Plan approved by EPA and LDEQ on July 23, 2007.
- 229 [40 CFR 60.Subpart H] Effective May 1, 2012, Rhodia will comply with the recordkeeping requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A, Subpart H and Appendix F.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

RLP 0014 3 - Sulfuric Acid Unit No. 1

- 230 [40 CFR 60.Subpart H] Effective May 1, 2012, meet a limit of 3.0 lbs SO₂/ton, expressed as lbs. of SO₂ emissions per ton of 100% sulfuric acid produced, averaged over each rolling 3-hour period. This limit does not apply during periods of Startup, Shutdown or Malfunction. For the purposes of this requirement, startup and shutdown are defined as follows. Startup is the 24-hour period when the sulfur-bearing feed starts after a main gas blower shutdown. Shutdown is the stopping of operation for any reason, beginning at the time sulfur-bearing feeds (except for natural gas and fuel oil) to the furnace cease.
- 231 [LAC 33:III.1311.C] Opacity ≤ 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. This requirement applies from the effective date until April 30, 2012.
Which Months: All Year Statistical Basis: Six-minute average
- 232 [LAC 33:III.1503.A.1] Sulfur dioxide ≤ 2000 ppmv. This requirement applies from the effective date until April 30, 2012.
Which Months: All Year Statistical Basis: Three-hour average
- 233 [LAC 33:III.1503.D.1] Determine compliance with the appropriate emission limitation in LAC 33:III.1503.A through 1503.C using the methods listed in LAC 33:III.1503.D.Table 4 or any such equivalent method as may be approved by DEQ. Use these methods for initial compliance determinations and for any additional compliance determinations as requested by DEQ. This requirement applies from the effective date until April 30, 2012.
- 234 [LAC 33:III.1511.A] Sulfur dioxide monitored by continuous emission monitor (CEM) continuously, except as specified in LAC 33:III.1511.C and 1511.D. Ensure that the measurement system is certified according to Performance Specification 2 of 40 CFR 60, Appendix B, and quality assured by the procedures in 40 CFR 60, Appendix F. Prior to May 1, 2012, Minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time. Up to 20 minutes per day for calibration will not be counted against the 90% data capture. If the analyzer is out for more than one hour, an alternate method is needed to ensure that concentration and lb/hr limits are met. As such, Rhodia will reduce the acid production rate to 425 ton/day or conduct Reich tests at one hour intervals. Normal waste fuel feed rates may continue. If the analyzer is out for >3 days in a month, the continuous monitoring requirement can be satisfied by increasing Reich testing frequency to 15 min intervals until the analyzer is back in service. If a spare analyzer is installed, a cylinder gas audit will be conducted on the spare analyzer prior to being put into service. RATA testing will continue using the same schedule as for the analyzer that was replaced. This requirement applies from the effective date until April 30, 2012. On and after May 1, 2012, Comply with Alternative Monitoring Plan per Consent Decree.
Which Months: All Year Statistical Basis: None specified
- 235 [LAC 33:III.1513.A.1] Sulfur dioxide recordkeeping by continuous emission monitor (CEM) continuously. This requirement applies from the effective date until April 30, 2012.
- 236 [LAC 33:III.1513.A.2] Submit compliance determination results: Due no later than 90 days after completion of test. This requirement applies from the effective date until April 30, 2012.
- 237 [LAC 33:III.1513.A.2] Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence. Record the initial and additional compliance determination data. This requirement applies from the effective date until April 30, 2012.
- 238 [LAC 33:III.1513.E] Submit excess emissions report: Due quarterly in accordance with LAC 33:I.Chapter 39. Submit reports of three-hour excess emissions and reports of emergency conditions. This requirement applies from the effective date until April 30, 2012.
- 239 [LAC 33:III.1513.E] Make all compliance data available to a representative of DEQ or the U.S. EPA on request. This requirement applies from the effective date until April 30, 2012.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Group: PCS 0002 TS Process

RLP 0014 3 - Sulfuric Acid Unit No. 1

- 240 [LAC 33:III.1513.E] Submit report: Due annually, by the 31st of March, in accordance with LAC 33:III.918. Report data required to demonstrate compliance with the provisions of LAC 33:III.Chapter 15. This requirement applies from the effective date until April 30, 2012.
- 241 [LAC 33:III.501.C.6] Rhodia shall install continuous emission monitors (CEMs) for NOx as part of the debottlenecking project. STATE ONLY.
- 242 [LAC 33:III.5107.A.2] Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

EQT 0140 10 - Preheater; Acid Unit No. 1

- 243 [LAC 33:III.1101.B] Opacity \leq 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified
- 244 [LAC 33:III.1313.C] Total suspended particulate \leq 0.6 lb/MMBTU of heat input.
Which Months: All Year Statistical Basis: None specified
- 245 [LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

EQT 0141 11 - Lime Silos

- 246 [LAC 33:III.1311.B] Total suspended particulate \leq 32.95 lb/hr using a max hourly operating rate throughput of 22.5 tons/hr. The rate of emission shall be the total of all emission points from the source.
Which Months: All Year Statistical Basis: None specified
- 247 [LAC 33:III.1311.C] Opacity \leq 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: Six-minute average

EQT 0142 12 - Oleum Loading Vent Scrubber

- 248 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device once every four hours. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 249 [LAC 33:III.501.C.6] Scrubber Flow rate \geq 50 gallons/min. Based on a four-hour block average. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. During periods of planned routine maintenance on the scrubber, the oleum tank and loading vents will either be routed to the process or to a backup portable scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 250 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy once every four hours. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. STATE ONLY.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

EQT 0142 12 - Oleum Loading Vent Scrubber

- 251 [LAC 33:III.501.C.6] Maximum scrubber solution strength of Sulfuric acid monitored by product sampling weekly. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: Weekly maximum
- 252 [LAC 33:III.501.C.6] Maximum scrubber solution strength of Sulfuric acid recordkeeping by electronic or hard copy weekly. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. STATE ONLY.
- 253 [LAC 33:III.501.C.6] Maximum scrubber solution strength of Sulfuric acid ≤ 20 percent. Maximum acid strength of 20%, based on a weekly sample. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. During periods of planned routine maintenance on the scrubber, the oleum tank and loading vents will either be routed to the process or to a backup portable scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: Weekly maximum
- 254 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.

EQT 0146 20 - Sulfur Feed Tank

- 255 [LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

EQT 0149 24 - Oleum Barge Loading Scrubber

- 256 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy once every four hours when barge vents are routed to scrubber. STATE ONLY.
- 257 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 258 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device once every four hours when barge vents are routed to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 259 [LAC 33:III.501.C.6] Flow rate ≥ 15 gallons/min when barge vents are routed to scrubber. STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 260 [LAC 33:III.501.C.6] Scrubber water must be replaced after every two barges loaded. STATE ONLY.

EQT 0152 28 - Gasoline Storage Tank

- 261 [LAC 33:III.2103.A] Each tank, reservoir, or container with a capacity less than 40,000 gallons but more than 250 gallons storing any VOC with a vapor pressure greater than 1.5 psia shall be equipped with a submerged fill pipe or a vapor loss control system.
- 262 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0153 6-90 - Package Boiler

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

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Air - Title V Regular Permit Minor Mod

EQT 0153 6-90 - Package Boiler

- 263 [40 CFR 60.44b(a)] Nitrogen oxides ≤ 0.1 lb/MMBTU heat input (expressed as NO₂), except as provided in 40 CFR 60.44b(k). The nitrogen oxide standards apply at all times, including periods of startup, shutdown, or malfunction. Subpart Db. [40 CFR 60.44b(a)]
- 264 [40 CFR 60.46b(c)] Which Months: All Year Statistical Basis: Thirty-day rolling average
Determine compliance with the NO_x standards in 40 CFR 60.44b through performance testing under 40 CFR 60.46b(e) or (f), or under 40 CFR 60.46b(g) or (h), as applicable. Subpart Db. [40 CFR 60.46b(c)]
- 265 [40 CFR 60.48b(b)(1)] Nitrogen oxides recordkeeping by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(b)(1)]
- 266 [40 CFR 60.48b(b)(1)] Nitrogen oxides monitored by CMS continuously. Calculate nitrogen oxides emission rates as specified in 40 CFR 60.48b(d), except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(b)(1)]
Which Months: All Year Statistical Basis: One-hour average
- 267 [40 CFR 60.48b(b)(1)] Oxygen or Carbon dioxide recordkeeping by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(b)(1)]
- 268 [40 CFR 60.48b(b)(1)] Oxygen or Carbon dioxide monitored by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(b)(1)]
Which Months: All Year Statistical Basis: One-hour average
- 269 [40 CFR 60.48b(c)] Operate NO_x continuous monitoring systems and record data during all periods of operation except for continuous monitoring system breakdowns and repairs. Record data during calibration checks, and zero and span adjustments. Subpart Db. [40 CFR 60.48b(c)]
- 270 [40 CFR 60.48b(e)] Nitrogen oxides: Follow the procedures under 40 CFR 60.13 and 40 CFR 60.48b(e)(1) through (e)(3) for installation, evaluation, and operation of the NO_x continuous monitoring system. Subpart Db. [40 CFR 60.48b(e)]
- 271 [40 CFR 60.48b(f)] When nitrogen oxides emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks and zero and span adjustments, obtain emission data by using standby monitoring systems, 40 CFR 60, Appendix A, Method 7, Method 7a, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days. Subpart Db. [40 CFR 60.48b(f)]
- 272 [40 CFR 60.48b(g)] Comply with the provisions of 40 CFR 60.48b(b), (c), (d), (e)(2), (e)(3), and (f), or monitor steam generating unit operating conditions and predict nitrogen oxides emission rates as specified in a plan submitted pursuant to 60.49b(c). Subpart Db. [40 CFR 60.48b(g)]
- 273 [40 CFR 60.49b(b)] Submit the performance test data from the initial performance test and the performance evaluation of the CEMS using the applicable performance specifications in 40 CFR 60 Appendix B to DEQ. Subpart Db. [40 CFR 60.49b(b)]
- 274 [40 CFR 60.49b(d)] Fuel rate recordkeeping by electronic or hard copy daily. Record the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for coal, distillate oil, residual oil, natural gas, wood, and municipal-type solid waste for the reporting period. Determine the annual capacity factor on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. Subpart Db. [40 CFR 60.49b(d)]
- 275 [40 CFR 60.49b(g)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records of the information listed in 40 CFR 60.49b(g)(1) through (g)(10) for each steam generating unit operating day, except as provided under 40 CFR 60.49b(p). Subpart Db. [40 CFR 60.49b(g)]
- 276 [40 CFR 60.49b(h)] Submit excess emissions report: Due by the 30th day following the end of each six-month period. Report any excess emissions which occurred during the reporting period. Subpart Db. [40 CFR 60.49b(h)]
- 277 [40 CFR 60.49b(i)] Submit reports containing the nitrogen dioxide emission rate information recorded under 40 CFR 60.49b(g). Subpart Db. [40 CFR 60.49b(i)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

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Air - Title V Regular Permit Minor Mod

EQT 0153 6-90 - Package Boiler

- 278 [40 CFR 60.Subpart Db] The permit specific requirements pertaining to NOx and O2 CEMs become effective upon installation of the NOx analyzer in 1H2010.
- 279 [40 CFR 60.Subpart Db] The permit specific requirements pertaining to the 30-day performance test per 40 CFR 60.46b(e) become effective upon installation of the NOx CEMs in 1H2010.
- 280 [LAC 33:III.1101.B] Opacity \leq 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified
- 281 [LAC 33:III.1313.C] Total suspended particulate \leq 0.6 lb/MMBTU of heat input.
Which Months: All Year Statistical Basis: None specified
- 282 [LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
- 283 [LAC 33:III.507.H.1.a] Nitrogen oxides: When NOx emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments, obtain emissions data by using a DEQ-approved monitoring plan per 40 CFR 60.49b(c) to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.

EQT 0186 1-06 - Rental Boiler

- 284 [40 CFR 60.44b(k)] Limit boiler operation to an annual capacity factor of 10 percent or less for natural gas. [40 CFR 60.44b(k)]
- 285 [40 CFR 60.49b(b)] Submit the maximum heat input capacity data from the demonstration of the maximum heat input capacity of the affected facility to DEQ. Subpart Db. [40 CFR 60.49b(b)]
- 286 [40 CFR 60.49b(d)(2)] Record and maintain records of the amount of each fuel combusted during each calendar month. [40 CFR 60.49b(d)(2)]
- 287 [40 CFR 60.49b(p)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records of the calendar date, the number of hours of operation, and the hourly steam load for each steam generating unit operating day. Subpart Db. [40 CFR 60.49b(p)]
- 288 [40 CFR 60.49b(q)] Submit a report to DEQ containing the annual capacity factor over the previous 12 months, the average fuel nitrogen content during the reporting period if residual oil was fired, and all other applicable information per 40 CFR 60.49b(q)(1) through (q)(3). Subpart Db. [40 CFR 60.49b(q)]
- 289 [40 CFR 60.49b] Report information specified in 40 CFR 60.49b(d); (o); (p); (q) and (w). Semi-annual reporting.
- 290 [LAC 33:III.1101.B] Opacity \leq 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified
- 291 [LAC 33:III.1313.C] Total suspended particulate \leq 0.6 lb/MMBTU of heat input.
Which Months: All Year Statistical Basis: None specified
- 292 [LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

EQT 0291 M10 - Diesel Fire-Water Pump

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

EQT 0291 M10 - Diesel Fire-Water Pump

- 293 [40 CFR 63.6603(a)] Equipment/operational data monitored by visual inspection/determination annually or every 1,000 hours of operation, whichever comes first. Inspect air cleaner. Subpart ZZZZ. [40 CFR 63.6603(a)]
Which Months: All Year Statistical Basis: None specified
- 294 [40 CFR 63.6603(a)] Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. Subpart ZZZZ. [40 CFR 63.6603(a), 40 CFR 63.6625(h)]
- 295 [40 CFR 63.6603(a)] Equipment/operational data monitored by visual inspection/determination annually or every 500 hours of operation, whichever comes first. Inspect all hoses and belts, and replace as necessary. Subpart ZZZZ. [40 CFR 63.6603(a)]
Which Months: All Year Statistical Basis: None specified
- 296 [40 CFR 63.6603(a)] Change oil and filter every 500 hours of operation or annually, whichever comes first. Subpart ZZZZ. [40 CFR 63.6603(a)]
- 297 [40 CFR 63.6605(a)] Be in compliance with emission limitations and operating limitations in 40 CFR 63 Subpart ZZZZ at all times. Subpart ZZZZ. [40 CFR 63.6605(a)]
- 298 [40 CFR 63.6605(b)] Operate and maintain at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6605(b)]
- 299 [40 CFR 63.6625(e)] Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6625(e)]
- 300 [40 CFR 63.6625(f)] Install a non-resettable hour meter. Subpart ZZZZ. [40 CFR 63.6625(f)]
- 301 [40 CFR 63.6640(a)] Demonstrate continuous compliance with each applicable emission limitation and operating limitation in 40 CFR 63 Subpart ZZZZ Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d according to methods specified in 40 CFR 63 Subpart ZZZZ Table 6. Subpart ZZZZ. [40 CFR 63.6640(a)]
- 302 [40 CFR 63.6640(f)(1)ii] Operate for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Limit maintenance checks and readiness testing to 100 hours per year. Subpart ZZZZ. [40 CFR 63.6640(f)(1)ii]
- 303 [40 CFR 63.6640(f)(1)iii] Operate up to 50 hours per year in non-emergency situations, but count those 50 hours towards the 100 hours per year provided for maintenance and testing. Do not use the 50 hours per year for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that the emergency engine may be operated for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. Do not operate for more than 30 minutes prior to the time when the emergency condition is expected to occur, and terminate the engine operation immediately after the facility is notified that the emergency condition is no longer imminent. Count the 15 hours per year of demand response operation as part of the 50 hours of operation per year provided for non-emergency situations. Subpart ZZZZ. [40 CFR 63.6640(f)(1)iii]
- 304 [40 CFR 63.6655] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.6655(a) through (f), as applicable. Subpart ZZZZ.
- 305 [40 CFR 63.Subpart ZZZZ] The 40 CFR 63 Subpart ZZZZ requirements listed for this engine become effective on May 3, 2013.

SPECIFIC REQUIREMENTS

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EQT 0291 M10 - Diesel Fire-Water Pump

- 306 [LAC 33:III.1101.B] Opacity \leq 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified
- 307 [LAC 33:III.1311.C] Opacity \leq 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: Six-minute average

GRP 0002 CAP-SAU - SULFURIC ACID UNITS 1 & 2

Group Members: RLP 0013 RLP 0014

- 308 [LAC 33:III.509.R.6.a] Before beginning actual construction of the project, permittee shall document and maintain a record of the following information: 1) a description of the project; 2) the emissions units whose emissions of a regulated pollutant could be affected by the project; and 3) a description of the applicability test used to determine that the project is not a major modification for any regulated pollutant, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded from the projected actual emissions (the demand growth exclusion) and an explanation for why such amount was excluded, and any netting calculations, if applicable. .
- 309 [LAC 33:III.509.R.6.c] After the first unit is debottlenecked, the permittee shall monitor the Sulfuric Acid Mist emissions that are emitted by this emission source (Unit 1 + Unit 2) which could increase as a result of the project and calculate and maintain a record of the annual emissions, in TPY on a 12-month rolling average basis, for a period of 10 years following resumption of regular operations after the change. Sulfuric Acid Emissions shall be estimated using actual production and an emission factor derived from biennial stack testing or other method approved by LDEQ Engineering. .
- 310 [LAC 33:III.509.R.6.e] Permittee shall submit a report to LDEQ within 60 days after the end of the year if annual emissions, in TPY, from the project in question exceed the baseline actual emissions by a "significant" (as defined in LAC 33:III.509.B) amount, and if such emissions differ from the preconstruction projection. This report shall contain the following: 1) the name, address, and telephone number of the major stationary source; 2) the annual emissions; and 3) any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection). .

GRP 0021 CAP-Comb - CAP - Combustion (Unit 1, Unit 2, Rental Boiler)

Group Members: EQT 0153 EQT 0186 RLP 0013 RLP 0014

- 311 [LAC 33:III.509.R.6.a] Before beginning actual construction of the project, permittee shall document and maintain a record of the following information: 1) a description of the project; 2) the emissions units whose emissions of a regulated pollutant could be affected by the project; and 3) a description of the applicability test used to determine that the project is not a major modification for any regulated pollutant, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded from the projected actual emissions (the demand growth exclusion) and an explanation for why such amount was excluded, and any netting calculations, if applicable. .

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20110006

Permit Number: 0840-00033-V4

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GRP 0021 CAP-Comb - CAP - Combustion (Unit 1, Unit 2, Rental Boiler)

- 312 [LAC 33:III.509.R.6.c] After the first unit is debottlenecked, the permittee shall monitor the NOx emissions that are emitted by this emission source (Unit 1 + Unit 2) which could increase as a result of the project and calculate and maintain a record of the annual emissions, in TPY on a 12-month rolling average basis, for a period of 10 years following resumption of regular operations after the change. Emissions shall be estimated using actual production and the emission factor(s) established in the air permit application, except for debottlenecked units which shall use data collected from NOx CEMs.
- 313 [LAC 33:III.509.R.6.c] After the first unit is debottlenecked, the permittee shall monitor the PM10 emissions that are emitted by this emission source (Unit 1 + Unit 2) which could increase as a result of the project and calculate and maintain a record of the annual emissions, in TPY on a 12-month rolling average basis, for a period of 10 years following resumption of regular operations after the change. Emissions shall be estimated using actual production and an emission factor derived from biennial stack testing or other method approved by LDEQ Engineering.
- 314 [LAC 33:III.509.R.6.e] Permittee shall submit a report to LDEQ within 60 days after the end of the year if annual emissions, in TPY, from the project in question exceed the baseline actual emissions by a "significant" (as defined in LAC 33:III.509.B) amount, and if such emissions differ from the preconstruction projection. This report shall contain the following: 1) the name, address, and telephone number of the major stationary source; 2) the annual emissions; and 3) any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).

UNF 0002 UNF02 - Facility Wide

- 315 [40 CFR 60.] All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.
- 316 [40 CFR 61.145(b)(1)] Provide DEQ with written notice of intention to demolish or renovate prior to performing activities to which 40 CFR 61 Subpart M applies. Delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery is acceptable. Subpart M. [40 CFR 61.145(b)(1)]
- 317 [40 CFR 61.148] Do not install or reinstall on a facility component any insulating materials that contain commercial asbestos if the materials are either molded and friable or wet-applied and friable after drying. Subpart M.
- 318 [40 CFR 61.355] Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.
- 319 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Rhodia maintains records for five years as required by Title V. Subpart FF.
- 320 [40 CFR 61.357(d)(2)] Submit report: Due annually, beginning on the date that equipment necessary to comply with 40 CFR 61 Subpart FF has been certified in accordance with 40 CFR 61.357(d)(1). Submit updates to the information listed in 40 CFR 61.357(a)(1) through (a)(3) or, if the information in 40 CFR 61.357(a)(1) through (3) is not changed in the following year, a statement to that effect. Subpart FF. [40 CFR 61.357(d)(2)]
- 321 [40 CFR 61.] All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart A.
- 322 [40 CFR 63.1(b)(3)] An owner or operator of a stationary source who is in the relevant source category and who determines that the source is not subject to a relevant standard or other requirement established under 40 CFR 63 Subpart A must keep a record as specified in 63.10(b)(3). [40 CFR 63.1(b)(3)]
- 323 [40 CFR 63.1095(a)(1)iii] Keep a record of each shipment of continuous butadiene waste streams. Subpart XX. [40 CFR 63.1095(a)(1)iii]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

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UNF 0002 UNF02 - Facility Wide

- 324 [40 CFR 63.1095(a)(1)] Route the continuous butadiene stream to a treatment process or wastewater treatment system used to treat benzene waste streams that complies with the standards specified in 40 CFR 61.348. Subpart XX. [40 CFR 63.1095(a)(1)]
- 325 [40 CFR 63.1095(a)(1)] Comply with the requirements of 40 CFR 61 Subpart FF, with the changes in 40 CFR 63 Subpart XX Table 2 and 40 CFR 63.1095(a)(1)(i) through (a)(1)(v). Subpart XX. [40 CFR 63.1095(a)(1)]
- 326 [40 CFR 63.1095(a)(1)] Include list of continuous butadiene waste streams in annual benzene NESHAP report and note whether or not streams were controlled. 40 CFR 63.1095(a)(1)(iv) & (v). Subpart XX. [40 CFR 63.1095(a)(1)]
- 327 [40 CFR 63.1095(a)(3)] Comply with the requirements of 40 CFR 63.1095 at all times except during periods of startup, shutdown, and malfunction, if the startup, shutdown, or malfunction precludes the ability of the affected source to comply with the requirements of 40 CFR 63.1095 and the provisions for periods of startup, shutdown, and malfunction, as specified in 40 CFR 63.1111, are followed. Subpart XX. [40 CFR 63.1095(a)(3)]
- 328 [40 CFR 63.1096(b)] Submit to EPA a written certification that affected waste streams will be managed and treated per the applicable sections in 40 CFR 63 Subpart XX. Not required unless/until written notice is received from generator of subject stream(s). Waste streams regulated under Subpart XX are to be treated and managed per 40 CFR Part 61 Subpart FF, National Emission Standards for Benzene Waste Operations. Rhodia's Baton Rouge site is already in compliance with Subpart FF and will manage XX-regulated waste streams in the same manner as for FF-regulated waste streams. Specifically, the XX-regulated waste streams will be burned as fuel in Unit No. 1 or Unit No. 2. Subpart XX. [40 CFR 63.1096(b)]
- 329 [40 CFR 63.1256(a)(5)(ii)(A)] Submit to EPA a written certification that affected wastewaters and/or wastewater residuals will be managed and treated per the applicable sections in 40 CFR 63.1256 (b) - (i). Not required unless/until written notice is received from generator of subject stream(s). Affected wastewater streams and/or residuals will be direct burned (i.e., bypassing storage) in the Unit No. 1 or Unit No. 2 furnace. [40 CFR 63.1256(a)(5)(ii)(A)]
- 330 [40 CFR 63.1256(b)] Comply with 40 CFR 63.1256(b) for each wastewater tank that receives, manages, or treats affected wastewater or its residual. Only Tanks 30D290 and 30D300 will be used for Subpart GGG regulated streams. [40 CFR 63.1256(b)]
- 331 [40 CFR 63.1256(d)(1)(iii)] For containers (trucks/railcars), the cover and all openings will be maintained in a closed position at all times that affected material is in the container except when necessary to use the opening for removal, inspection, sampling, or pressure relief events related to safety considerations. [40 CFR 63.1256(d)(1)(iii)]
- 332 [40 CFR 63.1256(g)(13)ii] Discharge affected streams to a boiler burning hazardous waste for which a final permit has been issued under 40 CFR Part 270 and that complies with the requirements of 40 CFR Part 266 Subpart H. The regeneration furnaces are regulated under RCRA as industrial furnaces and are defined as boilers in 40 CFR 1251. Per 1256(g)(13), RCRA units are exempt from the design evaluation or performance test requirements and from the monitoring requirements in 1256(a)(2)(iii) as well as recordkeeping and reporting requirements associated with monitoring and performance tests. [40 CFR 63.1256(g)(13)ii]
- 333 [40 CFR 63.132(g)(2)] Submit to EPA a written certification, signed by responsible official, that Group 1 wastewaters and/or wastewater residuals will be managed and treated per the applicable sections in 40 CFR 63.133 - 63.147. Not required unless/until written notice is received from generator of subject stream(s). [40 CFR 63.132(g)(2)]
- 334 [40 CFR 63.132(g)] Rhodia will comply with the provisions for off-site treatment of Group 1 HON wastewater or wastewater residuals in accordance with 40 CFR 63.132(g) if/when applicable. Subpart G. [40 CFR 63.132(g)]
- 335 [40 CFR 63.147] Maintain records as required by 40 CFR 63.147. This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewater or residual has been shipped to Rhodia. Subpart G.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

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UNF 0002 UNF02 - Facility Wide

- 336 [40 CFR 63.152(b)] Submit a Notification of Compliance Status (NCS) report within 150 days of the compliance date. As the treatment facility, the compliance date is the date upon which notice is first received that a HON Group 1 wastewater or wastewater residual has been recieved onsite. [40 CFR 63.152(b)]
- 337 [40 CFR 63.152(c)] Submit Periodic Reports: Due semiannually no later than 60 calendar days after the end of each 6-month period, except as specified in 40 CFR 63.152(c)(5) and (c)(6). Submit the first report no later than 8 months after the date the Notification of Compliance Status is due. Include the information specified in 40 CFR 63.152(c)(2) through (c)(4). Subpart G. [40 CFR 63.152(c)]
- 338 [40 CFR 63.152(f)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records as specified in 40 CFR 63.152(f)(1) through (f)(7). Subpart G. [40 CFR 63.152(f)]
- 339 [40 CFR 68.150] Submit Risk Management Plan (RMP): Due no later than June 21, 1999, or three years after the date on which a regulated substance is first listed under 68.130, or the date on which a regulated substance is first present above a threshold quantity in a process. Submit in a method and format to a central point as specified by EPA prior to June 21, 1999.
- 340 [40 CFR 68.155] Provide in the RMP an executive summary that includes a brief description of the elements listed in 68.155(a) through (g).
- 341 [40 CFR 68.160] Complete a single registration form and include in the RMP. Cover all regulated substances handled in covered processes. Include in the registration the information specified in 68.160(b)(1) through (13).
- 342 [40 CFR 68.165] Submit in the RMP information the release scenarios specified in 68.165(a)(2). Include the data listed in 68.165(b)(1) through (13).
- 343 [40 CFR 68.180] Provide in the RMP the emergency response information listed in 68.180(a) through (c).
- 344 [40 CFR 68.190(c)] Submit revised registration to EPA: Due within six months after a stationary source is no longer subject to 40 CFR 68. Indicate that the stationary source is no longer covered. [40 CFR 68.190(c)]
- 345 [40 CFR 68.190] Review and update the RMP as specified in 68.190(b) and submit it in a method and format to a central point specified by EPA prior to June 21, 1999.
- 346 [40 CFR 68.200] Maintain records supporting the implementation of 40 CFR 68 for five years unless otherwise provided.
- 347 [40 CFR 68.22] Use the endpoints specified in 68.22(a) through (g) for analyses of offsite consequences.
- 348 [40 CFR 68.25] Analyze the release scenarios in 68.25, as specified in 68.25(a) through (h).
- 349 [40 CFR 68.30] Estimate in the RMP the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
- 350 [40 CFR 68.33] List in the RMP environmental receptors within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
- 351 [40 CFR 68.36(b)] Submit revised RMP: Due within six months after changes in processes, quantities stored or handled, or any other aspect of the stationary source increase or decrease the distance to the endpoint by a factor of two or more. [40 CFR 68.36(b)]
- 352 [40 CFR 68.36] Review and update the offsite consequence analyses at least once every five years. Complete a revised analysis within six months if changes in processes, quantities stored or handled, or any other aspect of the stationary source might reasonably be expected to increase or decrease the distance to the endpoint by a factor of two or more.
- 353 [40 CFR 68.39] Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain the records specified in 68.39(a) through (e) on the offsite consequence analyses.

SPECIFIC REQUIREMENTS

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Air - Title V Regular Permit Minor Mod

UNF 0002 UNF02 - Facility Wide

- 354 [40 CFR 68.42] Include in the five-year accident history all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage. Include the information specified in 68.42(b)(1) through (10) for each accidental release.
- 355 [LAC 33:III.1103] Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited.
- 356 [LAC 33:III.1109.B] Outdoor burning of waste material or other combustible material is prohibited.
- 357 [LAC 33:III.1303.B] Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
- 358 [LAC 33:III.2113.A] Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
- 359 [LAC 33:III.219] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- 360 [LAC 33:III.2901.D] Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
- 361 [LAC 33:III.2901.F] If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.
- 362 [LAC 33:III.501.C.6] Total HAP \leq 9.18 tons/yr. Total HAP emissions are capped at 9.18 TPY. Emissions of each hazardous air pollutant (TAP) listed in Table A shall be calculated and recorded monthly, as well as the total for each HAP over the last twelve months. These records shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. Emissions greater than 9.18 tons per year of any combination of such HAPs for any twelve consecutive month period shall be a violation of this permit and must be reported to the Office of Environmental Compliance, Enforcement Division.
- 363 [LAC 33:III.5105.A.1] Which Months: All Year Statistical Basis: Annual maximum
Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard.
- 364 [LAC 33:III.5105.A.2] Do not cause a violation of any ambient air standard listed in LAC 33:III.Table 51.2, unless operating in accordance with LAC 33:III.5109.
- 365 [LAC 33:III.5105.A.3] Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
- 366 [LAC 33:III.5105.A.4] Do not fail to keep records, notify, report or revise reports as required under LAC 33:III.Chapter 51.Subchapter A.
- 367 [LAC 33:III.5107.A.2] Include a certification statement with the annual emission report and revisions to any emission report that attests that the information contained in the emission report is true, accurate, and complete, and that is signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

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UNF 0002 UNF02 - Facility Wide

- 368 [LAC 33:III.5107.A] Submit Annual Emissions Report: Due annually, by the 30th of April unless otherwise directed by DEQ, to the Office of Environmental Services in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.
- 369 [LAC 33:III.5107.B.1] Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but in no case later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere that results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).
- 370 [LAC 33:III.5107.B.2] Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:I.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:I.3923.
- 371 [LAC 33:III.5107.B.3] Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:I.3931. Submit notification in the manner provided in LAC 33:I.3923.
- 372 [LAC 33:III.5107.B.4] Submit written report: Due by certified mail to SPOC within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through B.3. Include the information specified in LAC 33:III.5107.B.4.a.i through B.4.a.viii.
- 373 [LAC 33:III.5107.B.5] Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, IF THEY CAN BE MEASURED AND CAN BE RELIABLY QUANTIFIED USING GOOD ENGINEERING PRACTICES, to DEQ along with the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
- 374 [LAC 33:III.5109.C] Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III.Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by DEQ.
- 375 [LAC 33:III.5113.A.1] Submit notification in writing: Due to SPOC not more than 60 days nor less than 30 days prior to initial start-up. Submit the anticipated date of the initial start-up.
- 376 [LAC 33:III.5113.A.2] Submit notification in writing: Due to SPOC within 10 working days after the actual date of initial start-up of the source. Submit the actual date of initial start-up of the source.
- 377 [LAC 33:III.5113.B.1] Ensure that all testing done to determine the emission of toxic air pollutants is conducted by qualified personnel.
- 378 [LAC 33:III.5113.B.1] Submit test results: Due in writing to the Office of Environmental Services within 60 days after completion of the test. Submit test results signed by the person responsible for the test.
- 379 [LAC 33:III.5113.B.1] Submit notification of testing: Due to the Office of Environmental Services at least 30 days prior to testing.

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- 380 [LAC 33:III.5113.B.2] Conduct emission tests as set forth in accordance with Test Methods of 40 CFR, parts 60, 61, and 63 or in accordance with alternative test methods approved by DEQ.
- 381 [LAC 33:III.5113.B.3] Provide necessary sampling and testing facilities, exclusive of instruments and sensing devices, as needed to properly determine the emission of toxic air pollutants.
- 382 [LAC 33:III.5113.B.4] Provide emission testing facilities as specified in LAC 33:III.5113.B.4.a through B.4.e.
- 383 [LAC 33:III.5113.B.5] Submit certified letter: Due to the Office of Environmental Services before the close of business on the sixtieth day following the completion of the emission test. Report the determinations of the emission test.
- 384 [LAC 33:III.5113.B.5] Analyze samples and determine emissions within 30 days after each emission test has been completed.
- 385 [LAC 33:III.5113.B.6] Retain records of emission test results and other data needed to determine emissions. Retained records at the source, or at an alternate location approved by DEQ for a minimum of two years, and make available upon request for inspection by DEQ.
- 386 [LAC 33:III.5113.B.7] Submit notification: Due to the Office of Environmental Services at least 30 days before the emission test. Submit notification of emission test to allow DEQ the opportunity to have an observer present during the test.
- 387 [LAC 33:III.5113.C.1] Maintain and operate each monitoring system in a manner consistent with good air pollution control practices for minimizing emissions. Repair or adjust any breakdown or malfunction of the monitoring system as soon as practicable after its occurrence.
- 388 [LAC 33:III.5113.C.5.d] Install all continuous monitoring systems or monitoring devices to make representative measurements under variable process or operating parameters.
- 389 [LAC 33:III.5113.C.5.e] Collect and reduce all data as specified in LAC 33:III.5113.C.5.e.i and ii.
- 390 [LAC 33:III.5113.C.7] Maintain records of monitoring data, monitoring system calibration checks, and the occurrence and duration of any period during which the monitoring system is malfunctioning or inoperative. Maintain these records at the source, or at an alternative location approved by DEQ, for a minimum of three years and make available, upon request, for inspection by DEQ.
- 391 [LAC 33:III.5151.F.1.f] An individual or company contracted to perform a demolition or renovation activity which disturbs RACM must be recognized by the Licensing Board for Contractors to perform asbestos abatement, and shall meet the requirements of LAC 33:III.5151.F.2 and F.3 for each demolition or renovation activity.
- 392 [LAC 33:III.535] Permittee shall comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and the Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC 33:III.537]. [LAC 33:III.535, LAC 33:III.537]
- 393 [LAC 33:III.5611.A] Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by the administrative authority.
- 394 [LAC 33:III.5611.B] During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.
- 395 [LAC 33:III.5901.A] Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.
- 396 [LAC 33:III.5907] Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur.
- 397 [LAC 33:III.5911.C] Submit amended registration: Due to the Office of Environmental Compliance within 60 days after the information in the submitted registration is no longer accurate.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

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Air - Title V Regular Permit Minor Mod

UNF 0002 UNF02 - Facility Wide

- 398 [LAC 33:III.919.F] Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 30th of April for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Services. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-G.
- 399 [LAC 33:III.927] Report the unauthorized discharge of any air pollutant into the atmosphere in accordance with LAC 33:I.Chapter 39, Notification Regulations and Procedures for Unauthorized Discharges. Submit written reports to the department pursuant to LAC 33:I.3925. Submit timely and appropriate follow-up reports detailing methods and procedures to be used to prevent similar atmospheric releases.
-

**AIR, PESTICIDES, AND TOXICS
6TH FLOOR RECORDS CENTER
INFILE / NEW FILE FORM**

New file: ☐

or

Infiling: ☒

Choose from the file types below:

Air Facility

- ☐ AR- Acid Rain
- ☐ CB- Confidential Business
- ☐ CO- Compliance
- ☐ EN- ** Enforcement
- ☐ GE- General
- ☒ PE- Permit
- ☐ RA- Regulatory Applicability
- ☐ Other:

TSCA

- ☐ AH - Asbestos Hazard Emergency Response Act
- ☐ AS or AW - Asbestos or Asbestos Worker Prot.
- ☐ CB - Confidential
- ☐ SI - Site Specific
- ☐ FO - Non Site Specific
- ☐ IM - ** Section 5 * 8
- ☐ LB - ** Lead
- ☐ PC - **PCB

** Extension of File Type (if needed):

- ☐ ES - Enforcement Sensitive
- ☐ DP - Docket Number

☐ **EPCRA / SARA**

☐ **FIFRA**

Proj No:	415
LDEQ AI:	1314

Permit Type	Number
Minor Pmt No:	
PSD Pmt No:	
TV Pmt No:	2184-V3
NNSR Pmt No:	
CAIR Pmt No:	
AR Pmt No:	

FRS Number: Company Name:

Site Name: Area Name:

Fac Street: Fac City:

Fac Cnty: Fac State: Fac Zip:

Requestor's Name:

Requestor's Phone:

Materials Sent To File Room

Application: Format: Paper

Permit(s):

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No. 7005 1820 0002 2091 7499

Activity No.: PER20120002
Agency Interest No. 1314

Daniel Tate
Plant Manager
Rhodia, Inc.
P.O. Box 828
Baton Rouge, La 70821

RE: Part 70 Operating Permit Modification – Rhodia, Inc.- CATHYVAL Plant
Baton Rouge, East Baton Rouge Parish, Louisiana

Dear Mr. Tate:

This is to inform you that the permit modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the 25th of April, 2016, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this 26 day of April, 2012.

Permit No.: 2184-V3

Sincerely,

A handwritten signature in black ink, appearing to read "S. L. Phillips".

Sam L. Phillips
Assistant Secretary
SLP: EMC
c: EPA Region VI ✓

RECEIVED - 6PDL
AIR PLANNING SEC.
12 MAY - 1 PM 2:23

18101-1 615:53
VIA HYUNDAI ETC
SUNSHINE 9501

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CATHYVAL Plant
Agency Interest No.: 1314
Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana

I. Background

Rhodia Inc. operates the CATHYVAL Plant located in Baton Rouge, East Baton Rouge Parish, Louisiana. The facility produces fine specialty organic chemicals that are used in food, fragrances, pharmaceuticals, and as laboratory reagents. The CATHYVAL Plant currently operates under Title V Permit No. 2184-V2, issued on April 25, 2011.

II. Origin

A permit application and Emission Inventory Questionnaire were submitted by Rhodia Inc. on March 26, 2012, requesting a Part 70 operating permit modification.

III. Description

The CATHYVAL Plant consists of the Cathy, Daphne, and Vanessa production units, and a Wastewater Treatment Unit. Steam to operate these units is supplied by the waste heat boilers of the Sulfuric Acid Plant.

Cathy Unit

The Cathy Unit produces pyrocatechol and hydroquinone for use as a raw material at the Daphne Unit and hydroquinone (HQ) for outside sales. Pyrocatechol and hydroquinone are synthesized using a proprietary Rhodia hydroxylation process. Phenol and hydrogen peroxide react to form pyrocatechol and hydroquinone. The reaction mixture is dissolved in a light organic solvent in the extraction section. Unreacted phenol is recovered using distillation and recycled back to the process. Waste acids and salts from the reaction are extracted in an aqueous phase and sent to waste water treatment. The tars are sent to the acid plant to be burned as fuel. Products (hydroquinone and pyrocatechol) are then separated in the splitter. Finally, pyrocatechol is transferred to storage in molten form or flaked and packaged while hydroquinone is crystallized, centrifuged, dried, and packaged. Pyrocatechol may also be mixed with a solvent and shipped as a liquid for certain customers.

Daphne Unit

The Daphne unit synthesizes guaiacol and guetol using a proprietary Rhodia process. Production of guaiacol and guetol from pyrocatechol is similar except that the guetol process uses ethyl chloride as a reactant, whereas the guaiacol process uses methyl chloride. Veratrole and *o*-diethoxybenzene (ODEB) are produced as co-products for outside sales.

Guaiacol is produced by a methylation process using pyrocatechol, methyl chloride, and caustic in the presence of water and a light organic solvent. Guetol is produced by an

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CATHYVAL Plant
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Baton Rouge, East Baton Rouge Parish, Louisiana

ethylation process using pyrocatechol, ethyl chloride, and caustic in the presence of water and a light organic solvent. The phases are separated, and organics in the aqueous layer are then removed by solvent extraction. The residual aqueous layer is sent to the waste treatment unit. The recovered mixture of organics and solvent is distilled to recover and recycle the solvent. It is then further distilled to recover pure guaiacol/guetol and veratrole/ODEB. The pure guaiacol/guetol is sent to the Vanessa Unit, or shipped to external customers by bulk shipments or in drums. Veratrole and ODEB are purified by washing and further distillation then shipped to external customers by bulk shipments or in drums. Heavy impurities from the distillations are sent to the acid plant to be burned as fuel.

The Daphne Unit operates in series with the Cathy and Vanessa Units, and runs more efficiently. Due to this higher efficiency, Rhodia may also utilize the Daphne Unit to manufacture para-methoxy-phenol (PMP) in place of guaiacol/guetol and veratrole/ODEB.

PMP and its byproduct para-di-methoxy-benzene (PDMB) are manufactured by methylation of HQ using methyl chloride. HQ produced by the Cathy Unit, or received from external suppliers, is used as a feedstock. The separation steps are similar to the guaiacol/guetol process. No purification of PDMB is necessary. PMP is shipped in bulk as a molten liquid.

Vanessa Unit

The Vanessa Unit synthesizes vanillin and ethyl vanillin utilizing a proprietary Rhodia process. In vanillin production, guaiacol reacts with sodium hydroxide to form sodium guaiacolate. Sodium guaiacolate is then condensed with glyoxylic acid to form sodium mandelate in the condensation section. In the extraction/distillation section, the unreacted guaiacol is then extracted with solvent. The organic phase is distilled and the aqueous phase is stripped to recover the guaiacol and solvent for recycle. In the oxidation area, the aqueous mandelate solution is reacted with air and caustic in the presence of a catalyst to form vanillate. The aqueous vanillate solution is neutralized to form the product vanillin. The vanillin is then extracted with solvent. After recovery and recycling of the solvent, the vanillin is purified by washing and distillation and converted to the solid product by flaking or crystallizing and drying. Crystallized product is packaged into boxes or other containers. Flaked product is packaged in super-sacks. Ethyl vanillin is manufactured through the same series of steps by substituting guetol for guaiacol.

Wastewater Treatment Unit

All liquid effluents from the CATHYVAL Plant are routed to the Wastewater Treatment Unit via Tank 28 and/or Tank 29. The effluent is sent to the aeration basins where it is treated aerobically with an activated sludge process. The sludge is then separated from the liquid effluent in the clarifiers and solid-liquid separation equipment.

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CATHYVAL Plant
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The clarified effluent is then discharged to the Mississippi River. All stormwater from the CATHYVAL Plant will be discharged to the Mississippi River after it has been flushed into Tank 29 (EQT 119) to prevent potential contamination (oil, zinc, etc.) from reaching the river. The stored stormwater from Tank 29 (EQT 119) is used as dilution water and treated as normal effluent into the aerobic/activated sludge process.

Air Emissions Control Measures

The primary emissions from the CATHYVAL Plant process are volatile organic compounds (VOCs), some of which are HAP/TAPs, and particulate matter (PM₁₀). There is a small amount of natural gas combustion emissions as well. The CATHYVAL plant is not a major Title V source on its own, but is subject to Title V permitting due to its co-location with the Sulfuric Acid Plant.

Any vent streams containing the chlorinated hydrocarbons methyl chloride and ethyl chloride are vented conveyed to the sulfuric acid regeneration furnaces in the acid plant (primarily Sulfuric Acid Unit No. 1, EPN 3, with Unit No. 2, EPN 2, as a backup) for combustion and HCl control. Non-chlorinated vent streams containing light organics are controlled by condensers and scrubbers. The effluent from the scrubbers is either recycled within the process or sent to the wastewater treatment unit. Some of the water sent to the wastewater treatment unit is first sent to a stripper, where organics are recovered and recycled to the process. The scrubbers are equipped with a continuous water flow meter as well as a high pressure drop alarm to ensure proper performance.

With this permit modification, Rhodia proposes the following changes:

- Increase hot water wash hours from 70 to 100 hours per year for Scrubber C-29 (EQT076) and from 16 to 100 hours per year for Scrubbers C-319 (EQT082) and Scrubber C-561 (EQT094); update the emission limits to reflect these changes.
- Delete TAP emissions for baghouses (EQT0075, EQT0110, EQT0111, EQT0112, and EQT0116). Emissions of particulate matter were incorrectly speciated into TAP compounds.
- Include of stack discharge characteristics for three engines, EQT0286, EQT0287, and EQT0288.
- Update General Condition XVII and Insignificant Activities lists.

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LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CATHYVAL Plant
Agency Interest No.: 1314
Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana

- Correct name of EQT0210 from "C-441 – Solvent 2 Washing Column" to "C-440 – Solvent 2 Washing Column."
- Update Specific Requirements list to reflect revisions made since previous permit modification.

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	1.98	1.98	-
SO ₂	0.16	0.16	-
NO _x	6.19	6.19	-
CO	3.98	3.98	-
VOC *	27.09	27.51	+0.42

*VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
Ethyl Chloride	0.12	0.12	-
Hydroquinone	0.36	0.09	-0.27
Methanol	3.38	3.38	-
Methyl Chloride	0.23	0.23	-
Methyl isobutyl ketone	9.46	9.46	-
Phenol	0.52	0.39	-0.13
Pyrocatechol	0.46	0.21	-0.25
Total HAPs	14.53	13.88	-0.65

IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD), does not apply.

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CATHYVAL Plant
Agency Interest No.: 1314
Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana

This facility is part of a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. Public Notice

Public notice is not required for minor modification to a Part 70 operating permit.

VII. Effects on Ambient Air

Emissions associated with the proposed modification were reviewed by LDEQ to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions for this modification. However, in March 2005, modeling was performed. The results are shown below.

Dispersion Model(s) Used:

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
MIBK	8-hour	323 µg/mg	4880

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CATHYVAL Plant
Agency Interest No.: 1314
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Baton Rouge, East Baton Rouge Parish, Louisiana

VIII. General Condition XVII Activities

Emission Rates - tons						
Work Activity	PM ₁₀	SO ₂	NO _x	CO	VOC	Other
Collecting 220 process samples/day for quality assurance in 4 oz bottles and assuming that a max of 1% is emitted to the atmosphere.					0.01	PC <0.01 HQ <0.01 Phenol <0.01 MIBK <0.01 MeOH <0.01 EtCl <0.01 MeCl <0.01
Drum Loading, unloading, and heating					0.22	
Phenol melting					0.02	Phenol 0.02
Maintenance activities including: Opening/removing pumps, compressors, instruments, valves, vents, and piping; Vessel/equipment/tank truck/ISO container/rail car openings; Filter and strainer change-outs; Miscellaneous equipment cleaning; Nitrogen/steam/air clearing of equipment and lines; Waste handling/re-packaging					0.25	PC 0.03 HQ 0.03 Phenol 0.03 MIBK 0.03 MeOH 0.03 EtCl 0.03 MeCl 0.03
Temporary storage of materials in tank trucks or ISO containers					0.05	PC 0.03 HQ <0.01
Fugitive dust	0.05					
Tote Loading of o-Vanillin					0.07	

IX. Insignificant Activities

ID No.:	Description	Physical/Operating Data	Citation
-	Defoamer for Tars Process	55 gallon drums	LAC 33:III.501.B.5.A.2
-	Defoamer for WWTU	55 gallon drums	LAC 33:III.501.B.5.A.2
-	Polymer for WWTU - Vulcan 4864	250 gallon totes	LAC 33:III.501.B.5.A.2
D-309X	Clarifier Polymer Feed Tank	1050 gallons	LAC 33:III.501.B.5.A.3
D-407X	Filter Polymer Feed Tank	1690 gallons	LAC 33:III.501.B.5.A.3
D-317X	Polymer Makeup Tank	880 gallons	LAC 33:III.501.B.5.A.3
D-320	Clarifier Floating Layer Tank	750 gallons	LAC 33:III.501.B.5.A.3
D-323	Clarifier Underflow Tank	3170 gallons	LAC 33:III.501.B.5.A.3

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ID No.:	Description	Physical/Operating Data	Citation
D-316	Effluent Pump Tank	4300 gallons	LAC 33:III.501.B.5.A.3
D-420	Filtrate Tank	1260 gallons	LAC 33:III.501.B.5.A.3
C-104	Perchloric Acid Tank, P&ID F103	Vents to Y-132	LAC 33:III.501.B.5.A.4
D-101	H ₂ O ₂ Tank P&ID F102	Vents to Y-120V	LAC 33:III.501.B.5.A.4
D-102	H ₂ O ₂ Tank P&ID F102	Vents to Y-121V	LAC 33:III.501.B.5.A.4
D-106	Polyphosphoric Acid Tank, P&ID F103	Vents to Y-136	LAC 33:III.501.B.5.A.4
D-605	Metabisulfate Injection Tank, P&ID F601	Vents to atmosphere	LAC 33:III.501.B.5.A.4
D-664	Oxalic Acid Injection Drum	Vents to atmosphere	LAC 33:III.501.B.5.A.4
	4 Laboratory Vents	N/A	LAC 33:III.501.B.5.A.6
	Analyzer Vents	N/A	LAC 33:III.501.B.5.A.9
C-243	Sulfuric Acid Dilution Tank	958 gallons	LAC 33:III.501.B.5.D

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ID No.:	Description	LAC 33:III. Chapter																	
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UNF01	CATHYVAL Plant	1							1					1	1	1	1	1	1
EQT 9	101 - LIGHTS TANK FARM SCRUBBER C-165						2				2	2							
EQT 10	D-148 - VANILLIN SOLVENT 1 TANK (METHANOL STORAGE)					1													
EQT 11	D-149 - ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)					1													
EQT 12	D-152 - SOLVENT 2 TANK (MIBK STORAGE)					1													
EQT 13	D-153 - SOLVENT 2 TANK (MIBK STORAGE)					1													
EQT 14	D-169 - SOLVENT 3 TANK (METHANOL STORAGE)					1													
EQT 15	102 - HEAVIES TANK FARM SCRUBBER C-187						2				2	2							
EQT 16	D-107 (Vanessa) - GUAIACOL STORAGE TANK					1													
EQT 17	D-111 (Vanessa) - GUETOL STORAGE TANK					1													
EQT 18	D-113 - 50% GLYOXYLIC ACID STORAGE TANK					1													
EQT 19	103 - CONDENSATION SCRUBBER C-201										2	2							
EQT 20	C-216 - GUAIACOL RECYCLE TANK					1													

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EQT 21	104 - SOLVENT 1 VENT SCRUBBER C-248										2	2							
EQT 22	C-236 - NEUTRALIZATION SURGE TANK					1													
EQT 23	C-240 - EXTRACTOR TAILS UPSET TANK					1													
EQT 24	C-243 - EXTRACTOR 1 TAILS SAFETY DECANTER									1									
EQT 25	C-244 - MANDELATE SURGE TANK					1													
EQT 26	C-249 - SOLVENT 1 SURGE TANK					1													
EQT 27	C-247 - SOLVENT 1 WASHING SAFETY DECANTER									1									
EQT 28	105 - OXIDATION SCRUBBER C-419										2								
EQT 29	C-409 - MANDELATE SURGE TANK					1													
EQT 30	D-417 - OXIDATION SURGE TANK					1													
EQT 31	106 - VANILLIN EXTRACTION SCRUBBER C-427					1				1	2	2							
EQT 32	C-421 - SOLVENT 2 SURGE TANK					1													
EQT 33	C-430 - SOLVENT 2 DECANTER									1									
EQT 34	C-432 - EXTRACTION 2 DRAIN TANK					1													
EQT 35	C-434 - EXTRACTION 2 TAILS SAFETY DECANTER									1									

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EQT 36	C-441 - AQUEOUS PHASE SURGE TANK					1													
EQT 37	C-501 - SOLVENT 2 DISTILLATION SURGE TANK					1													
EQT 38	C-558 - AQUEOUS EFFLUENTS TANK					1													
EQT 39	C-575 - SOLVENT 2 RECOVERY DECANTER									1									
EQT 40	107 DISTILLATION SCRUBBER C-557										2	2							
EQT 41	C-535 - TARS SURGE TANK					1													
EQT 42	C-616 - FLAKER SURGE TANK					1													
EQT 43	C-648 - RECYCLE PRODUCT HOPPER MELTER									1									
EQT 44	C-655 - MELTER SURGE TANK					1													
EQT 45	108 - CRYSTALLIZATION SCRUBBER C-624					1					2	2							
EQT 46	C-541 - METHANOL WASHING DRUM (Vents through C-801)									1									
EQT 47	C-801 - SOLVENT 3 RECOVERY FEED TANK					1													
EQT 48	C-603 - DISOLVER									1									
EQT 49	C-606 - VACUUM CRYSTALLIZER									1									
EQT 50	C-617 - CENTRIFUGE SURGE TANK					1													

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EQT 51	109 - BAGHOUSE FILTER/SCRUBBER C-704		1	2															
EQT 52	201 - TANK FARM SCRUBBER C- 146						2				2	2							
EQT 53	D-111 (Daphne) - PYROCATECHOL STORAGE TANK					1													
EQT 54	D-128 - TARS STORAGE TANK					1													
EQT 55	D-141 - VERATROLE STORAGE TANK					1													
EQT 56	202 - VENT SCRUBBER C-685										2	2							
EQT 57	C-201 - PC DISSOLUTION TANK											1							
EQT 58	C-553 - GUAIACOL DISTILLATION FEED TANK					1													
EQT 59	C-561 - RECYCLE PROCESS WATER TANK					1													
EQT 60	C-603 - GUAIACOL DISTILLATION TANK											1							
EQT 61	C-615 - TARS RECEIVER					1													
EQT 62	C-645 - PMDB RECEIVER					1													
EQT 63	C-651 - PC RECEIVER					1													
EQT 64	C-655 - GUAIACOL LT. ENDS RECEIVER					1													
EQT 65	C-660 - INTERS./VERATROLE RECEIVER					1													
EQT 66	C-665 - SECOND RECEIVER					1													

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EQT 67	C-670 - END OF CAMPAIGN RECEIVER					1													
EQT 68	C-675 - GUAIACOL RECEIVER					1													
EQT 69	C-701 - CRUDE VERATROLE WASH TANK											1							
EQT 70	C-705 - WATER GUAIACOLATE RECEIVER					1													
EQT 71	C-710 - CAUSTIC WASH RECEIVER					1													
EQT 72	C-751 - VERATROLE DISTILLATION KETTLE											1							
EQT 73	C-765 - LT. ENDS RECEIVER					1													
EQT 74	C-770 - DISTILLED VERATROLE RECEIVER					1													
EQT 75	203 - BAGHOUSE FOR HQ HANDLING		1	2															
EQT 76	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)										2	2							
EQT 77	C-223 - PHENOL DRAIN TANK REACTION SURGE DRUM									1									
EQT 78	C-416 - PREDEPHENOL REFLUX DRUM									1									
EQT 79	C-508 - VERTICAL TAR DILUTER									1									
EQT 80	C-530 - DISTILLATION DRAIN TANK									1									
EQT 81	C-532 - TAILS SURGE DRUM									1									

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EQT 82	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)									1	2	2							
EQT 83	C-113 - PHENOL UNLOADING TANK									1									
EQT 84	D-107 - WASHWATER TANK					1													
EQT 85	D-111 - PHENOL MAKE-UP TANK					1													
EQT 86	D-115 - WASHWATER/GUAIACOL TANK					1													
EQT 87	D-315 - RAFFINATE TANK									1									
EQT 88	D-204 - RECYCLE PHENOL TANK									1									
EQT 89	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)										1	2							
EQT 90	C-320 - IPE STORAGE TANK									1									
EQT 91	C-308 - IPE SETTLER									1									
EQT 92	C-311 - WASHWATER DRUM									1									
EQT 93	C-322 - ETHER DRAIN TANK									1									
EQT 94	304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)										2	2							
EQT 95	C-551 - PC RECEIVING DRUM									1									
EQT 96	C-563 - PC FLAKER FEED TANK									1									

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EQT 97	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)										2	2							
EQT 98	C-650 - REFLUX SURGE DRUM									1									
EQT 99	D-607 - HQ DISSOLVER TANK									1									
EQT100	D-610 - HQ SURGE TANK									1									
EQT101	D-612 - CARBON TREATER TANK									1									
EQT102	D-632 - CRYSTALLIZATION TANK									1									
EQT103	D-652 - MOTHER LIQUOR SURGE TANK									1									
EQT104	D-653 - CONC. COLUMN FEED TANK									1									
EQT105	D-657 - MOTHER LIQUOR SURGE DRUM									1									
EQT106	307 - SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601		1	2															
EQT107	308 - OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)		1	2															
EQT109	310 - CARBON BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)		1	2															
EQT110	311 - PC PACKAGING BAGHOUSE Y-731 (P&I.D. F703)		1	2															
EQT111	312 - HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)		1	2															

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EQT112	313 - HQ REWORK DUMPER BAGHOUSE S-693 FOR D607 (P&I.D. F602)		1	2															
EQT113	315A - FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)				1											1			
EQT114	315B - PRIMARY FLUID HEATER F-971 (P&I.D. F925)				1											1			
EQT115	316 - PRESSURE LEAF FILTER DRYING VENT Y-625		1	2															
EQT116	317 - VACUUM CLEAN-UP PACKAGING BAGHOUSE Y-760X (P&I.D. F703)		1	2															
GRP014	EMISSIONS CAP -- WW TREATMENT PLANT												1						
EQT118	401A - WWT TANK NO. 28 (P&I.D. F101)																		
EQT119	401B - Stormwater Tank NO. 29 (P&I.D. F101)																		
EQT120	401C - TANK D-197																		
EQT121	402A - WEST AERATION BASIN D210																		
EQT122	402B - EAST AERATION BASIN D213 (P&I.D. F201)																		
EQT123	402C - WEST CLARIFIER D301 (P&I.D. F302)																		
EQT124	402D - EAST CLARIFIER D304 (P&I.D. F302)																		

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EQT125	M-5 - CATHY (E925) AND VANESSA (E907) COOLING TOWERS (P&I.D. F903)		1	2															
EQT126	M-6 - CATHYVAL SUMPS												2						
EQT127	C-101 - IPE SOLVENT STORAGE TANK					1													
EQT128	C-351 - RAG LAYER DIVERTING TANK											1							
EQT129	C-401 - AQUEOUS PHASE SURGE TANK					1													
EQT130	C-352 - RAG LAYER SURGE TANK					1													
EQT131	C-461 - AQUEOUS EFFLUENT TANK					1													
EQT132	C-521 - ORGANIC PHASE SURGE TANKC					1													
EQT133	C-132 - MeCl STORAGE TANK					1													
EQT134	C-136 - EtCl STORAGE TANK					1													
EQT135	C-301 - ACIDIFICATION/DECANTATION TANK											1							
EQT136	C-503 - DEETHERATION IPE DECANter									1									
EQT137	D-681 - SCREENER RESIDUE DISSOLVER									1									
EQT139	110 - HIGH PURITY PC MIXING VESSEL						2			1									
EQT188	C-202 - PREMIXING REACTOR									1									

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EQT189	C-207 - VERATROLE STRIPPER									1									
EQT190	C-217 - NO. 1 CONDENSATION RTR.									1									
EQT191	C-219 - NO. 2 CONDENSATION RTR.									1									
EQT192	C-221 - NO. 3 CONDENSATION RTR.									1									
EQT193	C-223 - NO. 4 CONDENSATION RTR.									1									
EQT194	C-225 - NO. 5 CONDENSATION RTR.									1									
EQT195	C-227 - POLISHING REACTOR (RTR)									1									
EQT196	C-241 - GUAIACOL EXTRACTION COLUMN									1									
EQT197	C-245 - SOLVENT 1 WASHING COLUMN									1									
EQT198	C-301 - GUAIACOL RECOVERY COLUMN									1									
EQT199	C-306 - GUAIACOL/TARS SEPARATOR									1									
EQT200	C-312 - SOLVENT 1 STRIPPER DECANter									1									
EQT201	C-314 - SOLVENT 1 STRIPPER									1									
EQT202	C-316 - SOLVENT 1 COLD TRAP TANK									1									
EQT203	C-320 - GUAIACOL DISTILLATION REFLUX DRUM									1									

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EQT204	C-322X - SOLVENT 1 VACUUM PACKAGE SEPARATOR									1									
EQT205	H-317 - VACUUM SYSTEM									1									
EQT206	C-407 - OXIDATION REACTOR									1									
EQT207	C-416 - OXIDATION COLUMN									1									
EQT208	C-429 - CO2 SEPARATOR									1									
EQT209	C-435 - VANILLIN EXTRACTION COLUMN TANK									1									
EQT210	C-440 - SOLVENT 2 WASHING COLUMN									1									
EQT211	C-504 - VANILLIN/ SOLVENT 2 ATM. DISTILLATION COLUMN									1									
EQT212	C-507 - VANILLIN/ SOLVENT 2 VACUUM DISTILLATION COLUMN									1									
EQT213	C-516 - SOLVENT 2 COLD TRAP									1									
EQT214	C-533X - SOLVENT 2 VACUUM PACKAGE SEPARATOR									1									
EQT215	C-565 - SOLVENT 2 RECOVERY COLUMN									1									
EQT216	C-568 - SOLVENT 2 RECOVERY COLUMN									1									
EQT217	E-428 - CONDENSER									1									
EQT218	H-520 - VACUUM SYSTEM									1									
EQT219	C-525 - TARS REMOVAL COLUMN									1									
EQT220	C-529 - TARS BY-PASS									1									

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EQT221	C-545 - LIGHTS REMOVAL COLUMN									1									
EQT222	C-555A/B - VANILLIN COLD TRAPS									1									
EQT223	C-562 - VANILLIN PURIFICATION VACUUM PACKAGE SEPARATOR									1									
EQT224	H-556 - VACUUM SYSTEM									1									
EQT225	C-634X - DRYER SCRUBBER									1									
EQT226	C-637X - CRYSTALLIZATION VACUUM SEPARATOR									1									
EQT227	C-640 - DRYER									1									
EQT228	C-805 - SOLVENT 3 RECOVERY COLUMN									1									
EQT229	H-619 - VACUUM SYSTEM									1									
EQT230	Y-620 - CENTRIFUGE A									1									
EQT231	Y-621 - CENTRIFUGE B									1									
EQT232	Y-640 - DRYER									1									
EQT233	C-606 - GUAIACOL DISTILLATION COLUMN											1							
EQT234	C-633X - GUAIACOL VACUUM PACKAGE SEPARATOR											1							
EQT235	C-678A/B - GUAIACOL DISTILLATION COLD TRAPS											1							
EQT236	C-754 - VERATROLE DISTILLATION COLUMN											1							

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ID No.:	Description	LAC 33:III. Chapter																	
		1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	2115	2147	2149	2153	5	9	11	51	56	59*
EQT237	C-783X - VERATROLE VACUUM SEPARATOR											1							
EQT238	C-787 - VERATROLE DISTILLATION COLD TRAPS											1							
EQT239	C-213 - FIRST RTR										1								
EQT240	C-215 - SECOND RTR										1								
EQT241	C-217 - THIRD RTR										1								
EQT242	C-219 - FOURTH RTR										1								
EQT243	C-231 - FIFTH RTR										1								
EQT244	C-501 - DETARRING COLUMN										1								
EQT245	C-521 - FINAL DEPHENOLING COLUMN										1								
EQT246	E-418 - PHENOL CONDENSER										1								
EQT247	H-524 - VACUUM SYSTEM										1								
EQT248	C-301 - WATER STRIPPER										1								
EQT249	C-313 - EXTRACTION COLUMN										1								
EQT250	C-405 - DEHYDRATION COLUMN										1								
EQT251	E-401 - SOLVENT VENT CONDENSER										1								
EQT252	C-536 - SPLITTER COLUMN (PC/HQ SEP)										1								
EQT253	H-545 - VACUUM SYSTEM										1								
EQT254	S-560 - PC FLAKER									1									
EQT255	C-251 - BATCH RTR											1							

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

**CATHYVAL Plant
Agency Interest No.: 1314**

**Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana**

X. Applicable Louisiana and Federal Air Quality Requirements																			
ID No.:	Description	LAC 33:III. Chapter																	
		1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	2115	2147	2149	2153	5	9	11	51	56	59*
EQT256	H-640 - VACUUM SYSTEM FOR CRYSTALLIZERS									1									
EQT257	C-451 - EXTRACTION COLUMN									1									
EQT258	C-501 - DEETHERATION COLMN									1									
EQT259	C-511 - DEETHERATION QUAIACOL DECANter									1									
EQT260	C-551 - CRUDE GUAIACOL DEHYDRATION COLUMN									1									
EQT261	C-555 - WET GUAIACOL TANK					1													
EQT286	Fire-Water Pump G972A			1												1			
EQT287	Fire-Water Pump G972B			1												1			
EQT288	M-9 Emergency Diesel Generator for Daphne/Vanessa Sump			1												1			
EQT289	E-318 Predephenoling Vent Condenser									1									
EQT290	E-506 Detarring Condenser										1								
GRP022	Fire Pump Diesel Engines			1												1			
FUG1	F-6V - VANESSA FUGITIVE EMISSIONS							1											
FUG4	F-6C - CATHY FUGITIVE EMISSIONS							1											
FUG5	F-6D - DAPHNE FUGITIVE EMISSIONS							1											

* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
 -The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
 - 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
 - 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
- Blank – The regulations clearly do not apply to this type of emission source.

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR			
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
UNF01	CATHYVAL Plant	2					2	2	2	2	2	2		2	2	2	1	2	1	1	1
EQT 9	101 - LIGHTS TANK FARM SCRUBBER C-165																				
EQT 10	D-148 - VANILLIN SOLVENT 1 TANK (METHANOL STORAGE)																				
EQT 11	D-149 - ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)																				
EQT 12	D-152 - SOLVENT 2 TANK (MIBK STORAGE)																				
EQT 13	D-153 - SOLVENT 2 TANK (MIBK STORAGE)																				
EQT 14	D-169 - SOLVENT 3																				

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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X. Applicable Louisiana and Federal Air Quality Requirements																					
ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR			
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
	TANK (METHANOL STORAGE)																				
EQT 15	102 - HEAVIES TANK FARM SCRUBBER C-187																				
EQT 16	D-107 (Vanessa) - GUALACOL STORAGE TANK				2																
EQT 17	D-111 (Vanessa) - GUETOL STORAGE TANK				2																
EQT 18	D-113 - 50% GLYOXYLIC ACID STORAGE TANK				2																
EQT 19	103 - CONDENSATION SCRUBBER C-201																				
EQT 20	C-216 - GUALACOL RECYCLE TANK																				
EQT 21	104 - SOLVENT 1 VENT SCRUBBER C-248																				
EQT 22	C-236 - NEUTRALIZATION SURGE TANK																				
EQT 23	C-240 - EXTRACTOR TAILS UPSET TANK																				
EQT 24	C-242 - EXTRACTOR 1 TAILS SAFETY DECANTER																				
EQT 25	C-244 - MANDELATE SURGE TANK																				
EQT 26	C-249 - SOLVENT 1 SURGE TANK																				

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

**CATHYVAL Plant
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**Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana**

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR			
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT 27	C-247 - SOLVENT 1 WASHING SAFETY DECANTER																				
EQT 28	105 - OXIDATION SCRUBBER C-419																				
EQT 29	C-409 - MANDELATE SURGE TANK																				
EQT 30	C-417 - OXIDATION SURGE TANK				2																
EQT 31	106 - VANILLIN EXTRACTION SCRUBBER C-427																				
EQT 32	C-421 - SOLVENT 2 SURGE TANK C-421																				
EQT 33	C-430 - SOLVENT 2 DECANTER																				
EQT 34	C-432 - EXTRACTION 2 DRAIN TANK																				
EQT 35	C-434 - EXTRACTION 2 TAILS SAFETY DECANTER																				
EQT 36	C-441 - AQUEOUS PHASE SURGE TANK																				
EQT 37	C-501 - SOLVENT 2 DISTILLATION SURGE TANK																				
EQT 38	C-558 - AQUEOUS EFFLUENTS TANK C																				
EQT 39	C-575 - SOLVENT 2 RECOVERY DECANTER																				

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Rhodia, Inc.

Baton Rouge, East Baton Rouge Parish, Louisiana

X. Applicable Louisiana and Federal Air Quality Requirements																					
ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR			
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT 40	107 DISTILLATION SCRUBBER C-557																				
EQT 41	C-535 - TARS SURGE TANK																				
EQT 42	C-616 - FLAKER SURGE TANK																				
EQT 43	C-648 - RECYCLE PRODUCT HOPPER MELTER																				
EQT 44	C-655 - MELTER SURGE TANK																				
EQT 45	108 - CRYSTALLIZATION SCRUBBER																				
EQT 46	C-541 - METHANOL WASHING DRUM C-541 (Vents through C- 801)																				
EQT 47	C-801 - SOLVENT 3 RECOVERY FEED TANK																				
EQT 48	C-603 - DISOLVER																				
EQT 49	C-606 - VACUUM CRYSTALLIZER																				
EQT 50	C-617 - CENTRIFUGE SURGE TANK																				
EQT 51	109 - BAGHOUSE FILTER/SCRUBBER C- 704																				
EQT 52	201 - TANK FARM																				

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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X. Applicable Louisiana and Federal Air Quality Requirements																						
ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR				
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82	
	SCRUBBER C-146																					
EQT 53	D-111 (Daphne) - PYROCATECHOL STORAGE TANK				2																	
EQT 54	D-128 - TARS STORAGE TANK																					
EQT 55	D-141 - VERATROLE STORAGE TANK																					
EQT 56	202 - VENT SCRUBBER C-685																					
EQT 57	C-201 - PC DISSOLUTION TANK C-201																					
EQT 58	C-553 - GUAIACOL DISTILLATION FEED TANK																					
EQT 59	C-561 - RECYCLE PROCESS WATER TANK																					
EQT 60	C-603 - GUAIACOL DISTILLATION TANK																					
EQT 61	C-615 - TARS RECEIVER																					
EQT 62	C-645 - PMDB RECEIVER																					
EQT 63	C-651 - PC RECEIVER																					
EQT 64	C-655 - GUAIACOL LT. ENDS RECEIVER																					
EQT 65	C-660 - INTERS./VERATROLE RECEIVER																					
EQT 66	C-665 - SECOND																					

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Baton Rouge, East Baton Rouge Parish, Louisiana

X. Applicable Louisiana and Federal Air Quality Requirements																						
ID No.:	Description	40 CFR 60										40 CFR 61				40 CFR 63			40 CFR			
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82	
	RECEIVER																					
EQT 67	C-670 - END OF CAMPAIGN RECEIVER																					
EQT 68	C-675 - GUAIACOL RECEIVER																					
EQT 69	C-701 - CRUDE VERATROLE WASH TANK																					
EQT 70	C-705 - WATER GUAIACOLATE RECEIVER																					
EQT 71	C-710 - CAUSTIC WASH RECEIVER																					
EQT 72	C-751 - VERATROLE DISTILLATION KETTLE																					
EQT 73	C-765 - LT. ENDS RECEIVER																					
EQT 74	C-770 - DISTILLED VERATROLE RECEIVER																					
EQT 75	203 - BAGHOUSE FOR HQ HANDLING																					
EQT 76	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)																					
EQT 77	C-223 - PHENOL DRAIN TANK REACTION SURGE DRUM C-223																					
EQT 78	C-416 - PREDEPHENOL REFLUX DRUM																					

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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X. Applicable Louisiana and Federal Air Quality Requirements																						
ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR				
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82	
EQT 79	C-508 - VERTICAL TAR DILUTER																					
EQT 80	C-530 - DISTILLATION DRAN TANK																					
EQT 81	C-532 - TAILS SURGE DRUM C-																					
EQT 82	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)																					
EQT 83	C-113 - PHENOL UNLOADING TANK																					
EQT 84	D-107 - WASHWATER TANK				2																	
EQT 85	D-111 - PHENOL MAKE-UP TANK				2																	
EQT 86	D-115 - WASHWATER/GUAIAC OL TANK				2																	
EQT 87	D-315 - RAFFINATE TANK																					
EQT 88	D-204 - RECYCLE PHENOL TANK																					
EQT 89	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)																					
EQT 90	C-320 - IPE STORAGE TANK																					
EQT 91	C-308 - IPE SETTLER																					
EQT 92	C-311 - WASHWATER																					

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ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR			
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
	DRUM																				
EQT 93	C-322 - ETHER DRAIN TANK																				
EQT 94	304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)																				
EQT 95	C-551 - PC RECEIVING DRUM																				
EQT 96	C-563 - PC FLAKER FEED TANK																				
EQT 97	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)																				
EQT 98	C-650 - REFLUX SURGE DRUM																				
EQT 99	D-607 - HQ DISSOLVER TANK																				
EQT100	D-610 - HQ SURGE TANK																				
EQT101	D-612 - CARBON TREATER TANK																				
EQT102	D-632 - CRYSTALLIZATION TANK																				
EQT103	D-652 - MOTHER LIQUOR SURGE TANK																				
EQT104	D-653 - CONC. COLUMN FEED TANK																				
EQT105	D-657 - MOTHER LIQUOR SURGE DRUM																				

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X. Applicable Louisiana and Federal Air Quality Requirements																					
ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR			
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT106	307 - SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601																				
EQT107	308 - OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)																				
EQT109	310 - CARBON BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)																				
EQT110	311 - PC PACKAGING BAGHOUSE Y-731 (P&I.D. F703)																				
EQT111	312 - HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)																				
EQT112	313 - HQ REWORK DUMPER BAGHOUSE S- 693 FOR D607 (P&I.D. F602)																				
EQT113	315A - FLUID HEATER F- 962 (BACK-UP) (P&I.D. F927)																				
EQT114	315B - PRIMARY FLUID HEATER F-971 (P&I.D. F925)																				

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ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR			
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT115	316 - PRESSURE LEAF FILTER DRYING VENT Y-625																				
EQT116	317 - VACUUM CLEAN-UP PACKAGING BAGHOUSE Y-760X (P&I.D. F703)																				
GRP014	EMISSIONS CAP - WW TREATMENT PLANT																				
EQT118	401A - WWT TANK NO. 28 (P&I.D. F101)																				
EQT119	401B - Stormwater Tank No. 29 (P&I.D. F101)																				
EQT120	401C - TANK D-197																				
EQT121	402A - WEST AERATION BASIN D210																				
EQT122	402B - EAST AERATION BASIN D213 (P&I.D. F201)																				
EQT123	402C - WEST CLARIFIER D301 (P&I.D. F302)																				
EQT124	402D - EAST CLARIFIER D304 (P&I.D. F302)																				
EQT125	M-5 - CATHY (E925) AND VANESSA (E907) COOLING TOWERS (P&I.D. F903)																				
EQT126	M-6 - CATHYVAL SUMPS																				

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR				
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82	
EQT127	C-101 - IPE SOLVENT STORAGE TANK																					
EQT128	C-351 - RAG LAYER DIVERTING TANK																					
EQT129	C-401 - AQUEOUS PHASE SURGE TANK																					
EQT130	C-352 - RAG LAYER SURGE TANK																					
EQT131	C-461 - AQUEOUS EFFLUENT TANK																					
EQT132	C-521 - ORGANIC PHASE SURGE TANKC																					
EQT133	C-132 - MeCl STORAGE TANK																					
EQT134	C-136 - EtCl STORAGE TANK																					
EQT135	C-301 - ACIDIFICATION/DECANTATION TANK																					
EQT136	C-503 - DEETHERATION IPE DECANTER																					
EQT137	D-681 - SCREENER RESIDUE DISSOLVER																					
EQT139	110 - HIGH PURITY PC MIXING VESSEL																					
EQT188	C-202 - PREMIXING REACTOR																					
EQT189	C-207 - VERATROLE STRIPPER																					
EQT190	C-217 - NO. 1																					

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X. Applicable Louisiana and Federal Air Quality Requirements																					
ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR			
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
	CONDENSATION RTR.																				
EQT191	C-219 - NO. 2 CONDENSATION RTR.																				
EQT192	C-221 - NO. 3 CONDENSATION RTR.																				
EQT193	C-223 - NO. 4 CONDENSATION RTR.																				
EQT194	C-225 - NO. 5 CONDENSATION RTR.																				
EQT195	C-227 - POLISHING REACTOR (RTR)																				
EQT196	C-241 - GUAIACOL EXTRACTION COLUMN																				
EQT197	C-245 - SOLVENT 1 WASHING COLUMN																				
EQT198	C-301 - GUAIACOL RECOVERY COLUMN																				
EQT199	C-306 - GUAIACOL/TARS SEPARATOR																				
EQT200	C-312 - SOLVENT 1 STRIPPER DECANter																				
EQT201	C-314 - SOLVENT 1 STRIPPER																				
EQT202	C-316 - SOLVENT 1 COLD TRAP TANK																				
EQT203	C-320 - GUAIACOL DISTILLATION REFLUX DRUM																				
EQT204	C-322X - SOLVENT 1 VACUUM PACKAGE																				

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ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR				
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82	
	SEPARATOR																					
EQT205	H-317 - VACUUM SYSTEM																					
EQT206	C-407 - OXIDATION REACTOR																					
EQT207	C-416 - OXIDATION COLUMN																					
EQT208	C-429 - CO2 SEPARATOR																					
EQT209	C-435 - VANILLIN EXTRACTION COLUMN TANK																					
EQT210	C-440 - SOLVENT 2 WASHING COLUMN																					
EQT211	C-504 - VANILLIN/ SOLVENT 2 ATM. DISTILLATION COLUMN																					
EQT212	C-507 - VANILLIN/ SOLVENT 2 VACUUM DISTILLATION COLUMN																					
EQT213	C-516 - SOLVENT 2 COLD TRAP																					
EQT214	C-533X - SOLVENT 2 VACUUM PACKAGE SEPARATOR																					
EQT215	C-565 - SOLVENT 2 RECOVERY COLUMN																					
EQT216	C-568 - SOLVENT 2 RECOVERY COLUMN																					

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ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR			
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT217	E-428 - DONDENSER																				
EQT218	H-520 - VACUUM SYSTEM																				
EQT219	C-525 - TARS REMOVAL COLUMN																				
EQT220	C-529 - TARS BY-PASS																				
EQT221	C-545 - LIGHTS REMOVAL COLUMN																				
EQT222	C-555A/B - VANILLIN COLD TRAPS																				
EQT223	C-562 - VANILLIN PURIFICATION VACUUM PACKAGE SEPARATOR																				
EQT224	H-556 - VACUUM SYSTEM																				
EQT225	C-634X - DRYER SCRUBBER																				
EQT226	C-637X - CRYSTALLIZATION VACUUM SEPARATOR																				
EQT227	C-640 - DRYER																				
EQT228	C-805 - SOLVENT 3 RECOVERY COLUMN																				
EQT229	H-619 - VACUUM SYSTEM																				
EQT230	Y-620 - CENTRIFUGE A																				
EQT231	Y-621 - CENTRIFUGE B																				
EQT232	Y-640 - DRYER																				
EQT233	C-606 - GUALACOL																				

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		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82	
	DISTILLATION COLUMN																					
EQT234	C-633X - GUAIACOL VAUUM PACKAGE SEPARATOR																					
EQT235	C-678A/B - GUAIACOL DISTILLATION COLD TRAPS																					
EQT236	C-754 - VERATROLE DISTILLATION COLUMN																					
EQT237	C-783X - VERATROLE VACUUM SEPARATOR																					
EQT238	C-787 - VERATROLE DISTILLATION COLD TRAPS																					
EQT239	C-213 - FIRST RTR																					
EQT240	C-215 - SECOND RTR																					
EQT241	C-217 - THIRD RTR																					
EQT242	C-219 - FOURTH RTR																					
EQT243	C-231 - FIFTH RTR																					
EQT244	C-501 - DETARRING COLUMN																					
EQT245	C-521 - FINAL DEPHENOLING COLUMN																					
EQT246	E-418 - PHENOL CONDENSER																					
EQT247	H-524 - VACUUM SYSTEM																					

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X. Applicable Louisiana and Federal Air Quality Requirements																					
ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR			
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT248	C-301 - WATER STRIPPER																				
EQT249	C-313 - EXTRACTION COLUMN																				
EQT250	C-405 - DEHYDRATION COLUMN																				
EQT251	E-401 - SOLVENT VENT CONDENSER																				
EQT252	C-536 - SPLITTER COLUMN (PC/HQ SEP)																				
EQT253	H-545 - VACUUM SYSTEM																				
EQT254	S-560 - PC FLAKER																				
EQT255	C-251 - BATCH RTR																				
EQT256	H-640 - VACUUM SYSTEM FOR CRYSTALLIZERS																				
EQT257	C-451 - EXTRACTION COLUMN																				
EQT258	C-501 - DEETHERATION COLMN																				
EQT259	C-511 - DEETHERATION QUAIACOL DECANTER																				
EQT260	C-551 - CRUDE GUAIACOL DEHYDRATION COLUMN																				
EQT261	C-555 - WET GUAIACOL TANK																				
EQT286	Fire-Water Pump G972A																1				

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CATHYVAL Plant
Agency Interest No.: 1314

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana

X. Applicable Louisiana and Federal Air Quality Requirements																					
ID No.:	Description	40 CFR 60									40 CFR 61				40 CFR 63			40 CFR			
		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT287	Fire-Water Pump G972B																1				
EQT288	M-9 Emergency Diesel Generator for Daphne/Vanessa Sump																1				
EQT289	E-318 Predephenoling Vent Condenser																				
EQT290	E-506 Detarring Condenser																				
GRP022	Fire Pump Diesel Engines																1				
FUG1	F-6V - VANESSA FUGITIVE EMISSIONS					2															
FUG4	F-6C - CATHY FUGITIVE EMISSIONS					1															
FUG5	F-6D - DAPHNE FUGITIVE EMISSIONS					2															

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank -- The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CATHYVAL Plant
Agency Interest No.: 1314
Rhodia, Inc.

Baton Rouge, East Baton Rouge Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-applicability of a Source		
ID No.	Requirement	Notes
UNF001 Facility	NESHAP Part 60 Subpart A - General Provision	DOES NOT APPLY. No Part 60 standards apply in the CathyVal Plant.
	NSPS Part 60 Subpart III - Standards of Performance for VOC Emissions From the SOCMi Air Oxidation Unit Processes	DOES NOT APPLY. The CathyVal Plant does not produce any of the chemicals listed in 40 CFR 60.617 as products, co-products, by-products, or intermediates.
	NSPS Part 60 Subpart NNN - Standards of Performance for VOC Emissions from SOCMi Distillation Operations.	DOES NOT APPLY. The CathyVal Plant does not produce any of the chemicals listed in 40 CFR 60.617 as products, co-products, by-products, or intermediates.
	NSPS Part 60 Subpart RRR - Standards of Performance for VOC Emissions from SOCMi Reactor Processes	DOES NOT APPLY. The CathyVal Plant does not produce any of the chemicals listed in 40 CFR 60.617 as products, co-products, by-products, or intermediates.
	NSPS Part 60 Subpart YYY - Volatile Organic Compound Emissions from the SOCMi Wastewater (Proposed)	DOES NOT APPLY. The Cathy, Daphne, and Vanessa units do not produce SOCMi chemicals as primary products. Therefore, they are not affected facilities under NSPS YYY. Hydroquinone is not the primary product of the unit.
	NESHAP Part 61 Subpart A - General Provisions	DOES NOT APPLY. No Part 61 standards apply in the CathyVal Plant.
	NESHAP Part 61 Subpart M - National Emission Standard for Asbestos	DOES NOT APPLY. The CathyVal Plant does not contain any asbestos.
	NESHAP Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations	DOES NOT APPLY. The CathyVal Plant does not contain any benzene.
	NESHAP Part 63 Subpart A - General Provisions.	DOES NOT APPLY. Rhodia is not a major source of HAPs.
	NESHAP Part 63 Subpart FFFF - National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing	DOES NOT APPLY. Rhodia is not a major source of HAPs.
	NESHAP Part 64 - Compliance Assurance Monitoring	DOES NOT APPLY. No emission sources emit the major threshold amount of any pollutant.
	LAC 33:III Chapter 21, Subchapter L - Limiting Volatile Organic Compound Emissions from Cleanup Solvent Processing	DOES NOT APPLY. Rhodia does not have any affected cleaning operations according to the definition because the plant does not use solvents with vapor pressure >1.5 psia for cleaning operations.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CATHYVAL Plant Agency Interest No.: 1314

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-applicability of a Source		
UNF001 Facility (cont'd)	LAC 33:III Chapter 51 - Comprehensive Toxic Air Pollution Emissions Control Program [LAC 33:III.5109.A]	DOES NOT APPLY. The CathyVal plant does not emit any class I or class II TAPs for which sitewide emissions exceed the MER.
EQT009, EQT015 Tank Farm Scrubbers	LAC 33:III Chapter 21 - VOC Loading	DOES NOT APPLY. The maximum true vapor pressure of the VOCs loaded is less than 1.5 psia.
	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMi Reactor Processes and Distillation Operations	DOES NOT APPLY. Vanessa does not produce any products on the list of SOCMi chemicals provided in LAC 33:III.Chapter 21.Appendix A.
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Vanessa is not a batch process.
EQT010, EQT011, EQT012, EQT013, EQT020, EQT022, EQT023, EQT025, EQT026, EQT029, EQT038, EQT041, EQT042, EQT044, EQT054, EQT055, EQT058 - EQT059, EQT61 - EQT68, EQT070, EQT071, EQT073, EQT074, EQT261 Tanks	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.
EQT019, EQT021, EQT028, EQT031, EQT040, EQT045 Scrubbers	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMi Reactor Processes and Distillation Operations	DOES NOT APPLY. Vanessa does not produce any products on the list of SOCMi chemicals provided in LAC 33:III.Chapter 21.Appendix A.
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Vanessa is not a batch process.
EQT016 Storage Tank	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CATHYVAL Plant

Agency Interest No.: 1314

Rhodia, Inc.

Baton Rouge, East Baton Rouge Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-applicability of a Source		
EQT16 Storage Tank (cont'd)	40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY. Vapor pressure is less than 0.51 psia.
EQT017, EQT018 Storage Tanks	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.
	40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY. Capacity is less than 39,900 gallons and vapor pressure is less than 2.2 psia.
EQT024, EQT027, EQT035, EQT039, EQT043, EQT046, EQT048, EQT049, EQT077-EQT081, EQT083, EQT088, EQT090 - EQT093, EQT095, EQT096, EQT098-EQT105, EQT137, EQT188 - EQT 207, EQT209 - EQT 216, EQT218 - EQT232, EQT254, EQT256	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT. Emits less than 100 lb VOC in a 24-hour period.
EQT051	LAC 33:III Chapter 13 - Emissions Standards for Particulate Matter - Opacity Limits [LAC 33:III.1311.C]	EXEMPT. PM ₁₀ emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. [LAC33:III.1311.E]
EQT139 High Purity PC Mixing Vessel	LAC 33:III Chapter 21 - VOC Loading	DOES NOT APPLY. The maximum true vapor pressure of the VOCs loaded is less than 1.5 psia.
	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT. Emits less than 100 lb VOC in a 24-hour period.
EQT030, EQT053 Tanks	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.
	40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY. Capacity is less than 39,900 gallons and vapor pressure is less than 2.2 psia.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CATHYVAL Plant

Agency Interest No.: 1314

Rhodia, Inc.

Baton Rouge, East Baton Rouge Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-applicability of a Source		
EQT052 Tank Farm Scrubber	LAC 33:III Chapter 21 - VOC Loading	DOES NOT APPLY. The maximum true vapor pressure of the VOCs loaded is less than 1.5 psia.
	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMR Reactor Processes and Distillation Operations	DOES NOT APPLY. Daphne does not produce any products on the list of SOCMR chemicals provided in LAC 33:III Chapter 21, Appendix A.
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Although some sections of the Daphne unit are batch operated, there are no batch process vents routed to this scrubber.
EQT056 Vent Scrubber	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMR Reactor Processes and Distillation Operations	DOES NOT APPLY. Daphne does not produce any products on the list of SOCMR chemicals provided in LAC 33:III Chapter 21, Appendix A.
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT. No control is required for the batch process vents venting to the scrubber because the pool of non-exempt batch process vents from the Daphne unit is controlled with overall 90% efficiency utilizing other control equipment.
EQT069, EQT072, EQT236, EQT237, EQT238 Tanks	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT. Mass annual emission is less than 500 lb/yr. [LAC 33:III.2149.A.2.b]
EQT075 Baghouse	LAC 33:III Chapter 13 - Emissions Standards for Particulate Matter - Opacity Limits [LAC 33:III.1311.C]	EXEMPT. PM ₁₀ emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. [LAC33:III.1311.E]
EQT076 Vent Scrubber	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMR Reactor Processes and Distillation Operations	DOES NOT APPLY. If it can be demonstrated that a TRE index value is greater than 1.0 prior to the use of a recovery device, then such recovery device is not subject to the requirements of this Subchapter.
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Cathy is not a batch process. [LAC 33:III.2149]
EQT082 Tank Farm Scrubber	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMR Reactor Processes and Distillation Operations	DOES NOT APPLY. There are no distillation or reactor vents routed to this scrubber. [LAC 33:III.2147.A]
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Cathy is not a batch process. [LAC 33:III.2149]
EQT084 - EQT086	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CATHYVAL Plant
Agency Interest No.: 1314

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-applicability of a Source		
EQT084 – EQT086 Tanks (cont'd)	40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY. Vapor pressure is less than 0.51 psia.
EQT089 Vent Scrubber	LAC 33:III Chapter 21 Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Cathy is not a batch process. [LAC 33:III.2149]
EQT094 Vent Scrubber	LAC 33:III Chapter 21 Subchapter J - Limiting VOC Emissions from SOCMi Reactor Processes and Distillation Operations	DOES NOT APPLY. If it can be demonstrated that a TRE index value is greater than 1.0 prior to the use of a recovery device, then such recovery device is not subject to the requirements of this Subchapter.
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Cathy is not a batch process. [LAC 33:III.2149]
EQT097 Seal Pot	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMi Reactor Processes and Distillation Operations	DOES NOT APPLY. There are no distillation or reactor vents routed to this scrubber. [LAC 33:III.2147.A]
	LAC 33:III Chapter 21 Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Cathy is not a batch process. [LAC 33:III.2149]
EQT106, EQT107, EQT109, EQT110, EQT111, EQT112, EQT115, EQT116 Baghouses	LAC 33:III Chapter 13 - Emissions Standards for Particulate Matter - Opacity Limits [LAC 33:III.1311.C]	EXEMPT. PM ₁₀ emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. [LAC33.III.1311.E]
EQT113, EQT114 Heaters	LAC 33:III Chapter 15 - Emission Standards for Sulfur Dioxide	EXEMPT. Emissions from this unit are less than 250 tpy; therefore, Rhodia requests exemption from this requirement per LAC 33:III.1503.C.
FUG004 Cathy Fugitives	40 CFR 60 Subpart VV - Standards of Performance for SOCMi Equipment Leaks of VOC	EXEMPT. If an affected facility produces heavy liquid chemicals only from heavy liquid feed of raw materials, then it is exempt from 40 CFR 60.482-1 through 40 CFR 60.482-10. [40 CFR 60.480(d)(3)]
FUG005 Daphne Fugitives	40 CFR 60 Subpart VV - Standards of Performance for SOCMi Equipment Leaks of VOC	DOES NOT APPLY. No chemicals listed in 40 CFR 60.489 are produced as intermediates or final products at the Daphne unit. [40 CFR 60.480]
FUG001 Vanessa Fugitives	40 CFR 60 Subpart VV - Standards of Performance for SOCMi Equipment Leaks of VOC	DOES NOT APPLY. No chemicals listed in 40 CFR 60.489 are produced as intermediates or final products at the Vanessa unit. [40 CFR 60.480]
EQT125 Cooling Towers	LAC 33:III Chapter 13 - Emissions Standards for Particulate Matter - Opacity Limits [LAC 33:III.1311.C]	EXEMPT. PM ₁₀ emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. [LAC33.III.1311.E]

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

CATHYVAL Plant

Agency Interest No.: 1314

Rhodia, Inc.

Baton Rouge, East Baton Rouge Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-applicability of a Source		
EQT126 CATHYVAL Sumps	LAC 33:III Chapter 21 Subchapter M - Limiting VOC Emissions from Industrial Wastewater	EXEMPT. Any affected plant with an annual VOC loading in wastewater <10 Mg (11.03 tons) shall be exempt from the control requirements of Subsection B. [LAC 33:III.2153.G.1].
GRP014 Wastewater Treatment	LAC 33:III Chapter 21 Subchapter M - Limiting VOC Emissions from Industrial Wastewater	EXEMPT. Any affected plant with an annual VOC loading in wastewater <10 Mg (11.03 tons) shall be exempt from the control requirements of Subsection B. [LAC 33:III.2153.G.1]
EQT128 RAG layer Diverting Tank	LAC 33:III Chapter 21 Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT. Mass annual emission is less than 500 lb/yr. [LAC 33:III.2149.A.2.b]

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

General Information

AI ID: 1314 Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

Also Known As:	ID	Name	User Group	Start Date
	2203300033	AFS (EPA Air Facility System)	AFS (EPA Air Facility System)	01-01-2000
	0840-00033	CDS Number	CDS Number	08-05-2002
	8215111	EPA EIS Facility Site ID	EPA EIS Facility Site ID	01-01-2008
	LAD008161234	Rhodia Inc	Hazardous Waste Notification	11-17-1980
	PMT/PC	GPRA Baselines	Hazardous Waste Permitting	10-01-1997
	00861	Rhone Poulenc Basic Chemical Co	Inactive & Abandoned Sites	11-23-1999
	LAD008161234	Stauffer Chemical Co Baton Rouge	Inactive & Abandoned Sites	11-23-1999
	LA0005223	LPDES #	LPDES Permit #	05-22-2003
		Priority 1 Emergency Site	Priority 1 Emergency Site	07-18-2006
	GL-349	Radiation General License	Radiation License Number	12-14-2000
	LA-338A-N01	Radioactive Material License	Radiation License Number	12-14-2000
	G-033-3198	Site ID #	Solid Waste Facility No.	11-21-1999
	22318	Rhone Poulenc Basic Chemical Co Baton Rouge	TEMPO Merge	01-07-2002
	38329	Stauffer Chemical	TEMPO Merge	11-19-2001
	38427	Rhodia Inc	TEMPO Merge	01-11-2001
	70821STFFRAIRLI	TRI #	Toxic Release Inventory	07-19-2004

Physical Location: 1275 Airline Hwy
Baton Rouge, LA 70805

Main FAX: 2253593722
Main Phone: 2253593481

Mailing Address: 1275 Airline Hwy
Baton Rouge, LA 70805

Location of Front Gate: 30.508417 latitude, -91.187938 longitude, Coordinate Method: Lat./Long - Decimal Degrees, Coordinate Datum: NAD83

Related People:	Name	Mailing Address	Phone (Type)	Relationship
	S. B. "Bala" Balachandran	PO Box 828 Baton Rouge, LA 708210828	2253593443 (WF)	Accident Prevention Contact for
	S. B. "Bala" Balachandran	PO Box 828 Baton Rouge, LA 708210828	2253593742 (WP)	Accident Prevention Contact for
	Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Radiation Contact For
	Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Radiation License Billing Party for
	Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Water Billing Party for
	Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Haz. Waste Billing Party for
	J. Marcus Lewis	PO Box 828 Baton Rouge, LA 708210828	2253567111 (WP)	Responsible Official for
	John Richardson	PO Box 828 Baton Rouge, LA 70821	JOHN.RICHARDSOI	Air Permit Contact For
	John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Air Permit Contact For
	John Richardson	PO Box 828 Baton Rouge, LA 70821	JOHN.RICHARDSOI	Accident Prevention Billing Party for

General Information

AI ID: 1314 Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

Related People:

Name	Mailing Address	Phone (Type)	Relationship
John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Accident Prevention Billing Party for
John Richardson	PO Box 828 Baton Rouge, LA 70821	JOHN.RICHARDSOI	Emission Inventory Facility Contact for
John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Emission Inventory Facility Contact for
Daniel Tate	PO Box 828 Baton Rouge, LA 708210828		Responsible Official for

Related Organizations:

Name	Address	Phone (Type)	Relationship
Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Air Billing Party for
Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Operates
Rhodia Inc	c/o CT Corporation System Baton Rouge, LA 70808		Agent of Service for
Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Emission Inventory Billing Party
Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Owns

NAIC Codes:

325199, All Other Basic Organic Chemical Manufacturing

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120002
Permit Number: 2184-V3
Air - Title V Regular Permit Minor Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Cathyval Plant						
EQT 0009	101 - LIGHTS TANK FARM SCRUBBER C-165					8760 hr/yr
EQT 0010	D-148 - VANILLIN SOLVENT 1 TANK (MIBK STORAGE) D-148	9120 gallons	11.08 MM gallons/yr	5.54 MM gallons/yr	VANILLIN SOLVENT 1 TANK (MIBK STORAGE)	8760 hr/yr
EQT 0011	D-149 - ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)	9120 gallons	11.08 MM gallons/yr	5.54 MM gallons/yr	MIBK STORAGE	8760 hr/yr
EQT 0012	D-152 - SOLVENT 2 TANK (MIBK STORAGE) D-152	15400 gallons	19.3 MM gallons/yr	9.65 MM gallons/yr	MIBK STORAGE	8760 hr/yr
EQT 0013	D-153 - SOLVENT 2 TANK (MIBK STORAGE) D-153	15400 gallons	19.3 MM gallons/yr	9.65 MM gallons/yr	MIBK STORAGE	8760 hr/yr
EQT 0014	D-169 - SOLVENT 3 TANK (METHANOL STORAGE) D-169	11200 gallons	5.08 MM gallons/yr	5.08 MM gallons/yr	METHANOL / ETHANOL	8760 hr/yr
EQT 0015	102 - HEAVIES TANK FARM SCRUBBER C-187					8760 hr/yr
EQT 0016	D-107 (Vanessa) - GUAIACOL STORAGE TANK D-107	45685 gallons	1.68 MM gallons/yr	1.68 MM gallons/yr		8760 hr/yr
EQT 0017	D-111 (Vanessa) - GUETOL STORAGE TANK D-111	31725 gallons	1.57 MM gallons/yr	1.57 MM gallons/yr		8760 hr/yr
EQT 0018	D-113 (Vanessa) - GLYOXYLIC ACID STORAGE TANK D-113	31725 gallons				8760 hr/yr
EQT 0019	103 - CONDENSATION SCRUBBER C-201					8760 hr/yr
EQT 0020	C-216 - GUAIACOL RECYCLE TANK C-216	780 gallons				8760 hr/yr
EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248					8760 hr/yr
EQT 0022	C-236 - NEUTRALIZATION SURGE TANK C-236	1587 gallons				8760 hr/yr
EQT 0023	C-240 - EXTRACTOR TAILS UPSET TANK C-240	2570 gallons				8760 hr/yr
EQT 0024	C-243 - EXTRACTOR 1 TAILS SAFETY DECANter C-243	900 gallons				8760 hr/yr
EQT 0025	C-244 - MANDELATE SURGE TANK C-244	2570 gallons				8760 hr/yr
EQT 0026	C-249 - SOLVENT 1 SURGE TANK C-249	1600 gallons				8760 hr/yr
EQT 0027	C-247 - SOLVENT 1 WASHING SAFETY DECANter C-247	225 gallons				8760 hr/yr
EQT 0028	105 - OXIDATION SCRUBBER C-419					8760 hr/yr
EQT 0029	C-409 - MANDELATE SURGE TANK C-409	2575 gallons				8760 hr/yr
EQT 0030	C-417 - OXIDATION SURGE TANK D-417	22000 gallons				8760 hr/yr
EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427					8760 hr/yr
EQT 0032	C-421 - SOLVENT 2 SURGE TANK C-421	1785 gallons				8760 hr/yr
EQT 0033	C-430 - SOLVENT 2 DECANter C-430	2000 gallons				8760 hr/yr
EQT 0034	C-432 - EXTRACTION 2 DRAIN TANK C-432	8000 gallons				8760 hr/yr
EQT 0035	C-434 - EXTRACTION 2 TAILS SAFETY DECANter C-434	1400 gallons				8760 hr/yr
EQT 0036	C-441 - AQUEOUS PHASE SURGE TANK C-441	4100 gallons				8760 hr/yr
EQT 0037	C-501 - SOLVENT 2 DISTILLATION SURGE TANK C-501	8095 gallons				8760 hr/yr
EQT 0038	C-558 - AQUEOUS EFFLUENTS TANK C-558	2700 gallons				8760 hr/yr
EQT 0039	C-575 - SOLVENT 2 RECOVERY DECANter C-575	70 gallons				8760 hr/yr
EQT 0040	107 - DISTILLATION SCRUBBER C-557					8760 hr/yr
EQT 0041	C-535 - TARS SURGE TANK C-535	2885 gallons				8760 hr/yr
EQT 0042	C-616 - FLAKER SURGE TANK C-616	3870 gallons				8760 hr/yr
EQT 0043	C-648 - RECYCLE PRODUCT HOPPER MELTER C-648	1060 gallons				8760 hr/yr
EQT 0044	C-655 - MELTER SURGE TANK C-655	1735 gallons				8760 hr/yr

INVENTORIES

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Cathyval Plant						
EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624					8760 hr/yr
EQT 0046	C-541 - METHANOL WASHING DRUM C-541 (Vents through C-801)	600 gallons				8760 hr/yr
EQT 0047	C-801 - SOLVENT 3 RECOVERY FEED TANK C-801	6000 gallons				8760 hr/yr
EQT 0048	C-603 - DISOLVER C-603	2300 gallons				8760 hr/yr
EQT 0049	C-606 - VACUUM CRYSTALLIZER C-606	3710 gallons				8760 hr/yr
EQT 0050	C-617 - CENTRIFUGE SURGE TANK C-617	2385 gallons				8760 hr/yr
EQT 0051	109 - BAGHOUSE FILTER/SCRUBBER C-704					8760 hr/yr
EQT 0052	201 - TANK FARM SCRUBBER C-146					8760 hr/yr
EQT 0053	D-111 (Daphne) - PYROCATECHOL STORAGE TANK	27165 gallons	1.74 MM gallons/yr	1.74 MM gallons/yr	PYROCATECHOL	8760 hr/yr
EQT 0054	D-128 - TARS STORAGE TANK D-128	7050 gallons	1 MM gallons/yr	1 MM gallons/yr	TARS	8760 hr/yr
EQT 0055	D-141 - VERATROLE STORAGE TANK D-141	5825 gallons	.21 MM gallons/yr	.21 MM gallons/yr	VERATROL	8760 hr/yr
EQT 0056	202 - VENT SCRUBBER C-685					8760 hr/yr
EQT 0057	C-201 - PC DISSOLUTION TANK C-201	4750 gallons				8760 hr/yr
EQT 0058	C-553 - GUAIACOL DISTILLATION FEED TANK C-553	8000 gallons				8760 hr/yr
EQT 0059	C-561 - RECYCLE PROCESS WATER TANK C-561	3100 gallons				8760 hr/yr
EQT 0060	C-603 - GUAIACOL DISTILLATION KETTLE C-603	8800 gallons				8760 hr/yr
EQT 0061	C-615 - TARS RECEIVER C-615	1150 gallons				8760 hr/yr
EQT 0062	C-645 - PMDB RECEIVER C-645	2500 gallons				8760 hr/yr
EQT 0063	C-651 - PC RECEIVER C-651	2100 gallons				8760 hr/yr
EQT 0064	C-655 - GUAIACOL LT. ENDS RECEIVER C-655	500 gallons				8760 hr/yr
EQT 0065	C-660 - INTERS./VERATROLE RECEIVER C-660	1325 gallons				8760 hr/yr
EQT 0066	C-665 - SECOND RECEIVER C-665	750 gallons				8760 hr/yr
EQT 0067	C-670 - END OF CAMPAIGN RECEIVER C-670	1300 gallons				8760 hr/yr
EQT 0068	C-675 - GUAIACOL RECEIVER C-675	5227 gallons				8760 hr/yr
EQT 0069	C-701 - CRUDE VERATROLE WASH TANK C-701	1550 gallons				8760 hr/yr
EQT 0070	C-705 - WATER GUAIACOLATE RECEIVER C-705	1325 gallons				8760 hr/yr
EQT 0071	C-710 - CAUSTIC WASH RECEIVER C-710	897 gallons				8760 hr/yr
EQT 0072	C-751 - VERATROLE DISTILLATION KETTLE C-751	980 gallons				8760 hr/yr
EQT 0073	C-765 - LT. ENDS RECEIVER C-765	110 gallons				8760 hr/yr
EQT 0074	C-770 - DISTILLED VERATROLE RECEIVER C-770	800 gallons				8760 hr/yr
EQT 0075	203 - BAGHOUSE FOR HQ HANDLING					1000 hr/yr
EQT 0076	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)					8760 hr/yr
EQT 0077	C-223 - PHENOL DRAIN TANK REACTION SURGE DRUM C-223	765 gallons				8760 hr/yr
EQT 0078	C-416 - PREDEPHENOL REFLUX DRUM C-416	2937 gallons				8760 hr/yr
EQT 0079	C-508 - VERTICAL TAR DILUTER C-508	264 gallons				8760 hr/yr
EQT 0080	C-530 - DISTILLATION DRAN TANK C-530	761 gallons				8760 hr/yr

INVENTORIES

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120002
Permit Number: 2184-V3
Air - Title V Regular Permit Minor Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Cathyal Plant						
EQT 0081	C-532 - TAILS SURGE DRUM C-532	4635 gallons				8760 hr/yr
EQT 0082	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)					8760 hr/yr
EQT 0083	C-113 - PHENOL UNLOADING TANK C-113	1000 gallons				8760 hr/yr
EQT 0084	D-107 - WASHWATER TANK D-107	88900 gallons				8760 hr/yr
EQT 0085	D-111 - PHENOL MAKE-UP TANK D-111	66100 gallons				8760 hr/yr
EQT 0086	D-115 - WASHWATER/GUAIACOL TANK D-115	42300 gallons				8760 hr/yr
EQT 0087	D-315 - RAFFINATE TANK D-315	58000 gallons				8760 hr/yr
EQT 0088	D-204 - RECYCLE PHENOL TANK D-204	18500 gallons				8760 hr/yr
EQT 0089	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)					8760 hr/yr
EQT 0090	C-320 - IPE STORAGE TANK C-320	23978 gallons				8760 hr/yr
EQT 0091	C-308 - IPE SETTLER C-308	6780 gallons				8760 hr/yr
EQT 0092	C-311 - WASHWATER DRUM C-311	6822 gallons				8760 hr/yr
EQT 0093	C-322 - ETHER DRAIN TANK C-322	673 gallons				8760 hr/yr
EQT 0094	304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)					8760 hr/yr
EQT 0095	C-551 - PC RECEIVING DRUM C-551	500 gallons				8760 hr/yr
EQT 0096	C-563 - PC FLAKER FEED TANK C-563	500 gallons				8760 hr/yr
EQT 0097	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)					8760 hr/yr
EQT 0098	C-650 - REFLUX SURGE DRUM C-650	350 gallons				8760 hr/yr
EQT 0099	D-607 - HQ DISSOLVER TANK D-607	1375 gallons				8760 hr/yr
EQT 0100	D-610 - HQ SURGE TANK D-610	7000 gallons				8760 hr/yr
EQT 0101	D-612 - CARBON TREATER TANK D-612	700 gallons				8760 hr/yr
EQT 0102	D-632 - CRYSTALLIZATION TANK D-632	1763 gallons				8760 hr/yr
EQT 0103	D-652 - MOTHER LIQUOR SURGE TANK D-652	8068 gallons				8760 hr/yr
EQT 0104	D-653 - CONC. COLUMN FEED TANK D-653	6792 gallons				8760 hr/yr
EQT 0105	D-657 - MOTHER LIQUOR SURGE DRUM D-657	85 gallons				8760 hr/yr
EQT 0106	307 - SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601					8760 hr/yr
EQT 0107	308 - OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)					8760 hr/yr
EQT 0109	310 - CARBON BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)					8760 hr/yr
EQT 0110	311 - PC PACKAGING BAGHOUSE Y-731 (P&I.D. F703)					8760 hr/yr
EQT 0111	312 - HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)					8760 hr/yr
EQT 0112	313 - HQ REWORK DUMPER BAGHOUSE S-693 FOR D607 (P&I.D. F602)					8760 hr/yr
EQT 0113	315A - FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)		6 MM BTU/hr	6 MM BTU/hr		3024 hr/yr
EQT 0114	315B - PRIMARY FLUID HEATER F-971 (P&I.D. F925)		8 MM BTU/hr	8 MM BTU/hr		8760 hr/yr
EQT 0115	316 - PRESSURE LEAF FILTER DRYING VENT Y-625					8760 hr/yr

INVENTORIES

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120002
Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Cathyval Plant						
EQT 0116	317 - VACUUM CLEAN-UP PACKAGING BAGHOUSE Y-760X (P&I.D. F703)					8760 hr/yr
EQT 0118	401A - WWT TANK NO. 28 (P&I.D. F101)	600000 gallons		260 gallons/min	WASTEWATER	8760 hr/yr
EQT 0119	401B - STORMWATER TANK NO. 29 (P&I.D. F101)	1.5 million gallons		290 gallons/min	STORMWATER	8760 hr/yr
EQT 0120	401C - TANK D-197	50000 gallons		48 gallons/min	WASTEWATER	8760 hr/yr
EQT 0121	402A - WEST AERATION BASIN D210	1.53 million gallons		550 gallons/min	WASTEWATER	8760 hr/yr
EQT 0122	402B - EAST AERATION BASIN D213 (P&I.D. F201)	1.53 million gallons		550 gallons/min	WASTEWATER	8760 hr/yr
EQT 0123	402C - WEST CLARIFIER D301 (P&I.D. F302)	296200 gallons		550 gallons/min	WASTEWATER	8760 hr/yr
EQT 0124	402D - EAST CLARIFIER D304 (P&I.D. F302)	296200 gallons		550 gallons/min	WASTEWATER	8760 hr/yr
EQT 0125	M-5 - CATHY (E925) AND VANESSA (E907) COOLING TOWERS (P&I.D. F903)		19000 gallons/min	19000 gallons/min		8760 hr/yr
EQT 0126	M-6 - CATHYVAL SUMPS					8760 hr/yr
EQT 0127	C-101 - IPE SOLVENT STORAGE TANK C-101	8840 gallons				8760 hr/yr
EQT 0128	C-351 - RAG LAYER DIVERTING TANK C-351	3430 gallons				8760 hr/yr
EQT 0129	C-401 - AQUEOUS PHASE SURGE TANK C-401	6162 gallons				8760 hr/yr
EQT 0130	C-352 - RAG LAYER SURGE TANK C-352	1500 gallons				8760 hr/yr
EQT 0131	C-461 - AQUEOUS EFFLUENT TANK C-461	715 gallons				8760 hr/yr
EQT 0132	C-521 - ORGANIC PHASE SURGE TANK C-521	7070 gallons				8760 hr/yr
EQT 0133	C-132 - MeCl STORAGE TANK C-132	14340 gallons				8760 hr/yr
EQT 0134	C-136 - EICI STORAGE TANK C-136	15400 gallons				8760 hr/yr
EQT 0135	C-301 - ACIDIFICATION/DECANTATION TANK C-301	8000 gallons				8760 hr/yr
EQT 0136	C-503 - DEETHERATION IPE DECANter C-503	208 gallons				8760 hr/yr
EQT 0137	D-681 - SCREENER RESIDUE DISSOLVER D-681	212 gallons				8760 hr/yr
EQT 0139	110 - HIGH PURITY PC MIXING VESSEL	6000 gallons	2200000 lb/yr	2200000 lb/yr		8760 hr/yr
EQT 0188	C-202 - Premixing Reactor					8760 hr/yr
EQT 0189	C-207 - Veratrole Stripper					8760 hr/yr
EQT 0190	C-217 - No. 1 Condensation Reactor					8760 hr/yr
EQT 0191	C-219 - No. 2 Condensation Reactor	1500 gallons				8760 hr/yr
EQT 0192	C-221 - No. 3 Condensation Reactor	1500 gallons				8760 hr/yr
EQT 0193	C-223 - No. 4 Condensation Reactor	1500 gallons				8760 hr/yr
EQT 0194	C-225 - No. 5 Condensation Reactor	1500 gallons				8760 hr/yr
EQT 0195	C-227 - Polishing Reactor					8760 hr/yr
EQT 0196	C-241 - Gualacol Extraction Column					8760 hr/yr
EQT 0197	C-245 - Solvent 1 Washing Column					8760 hr/yr
EQT 0198	C-301 - Gualacol Recovery Column					8760 hr/yr
EQT 0199	C-306 - Gualacol/Tars Separator					8760 hr/yr
EQT 0200	C-312 - Solvent 1Stripper Decanter					8760 hr/yr
EQT 0201	C-314 - Solvent 1Stripper					8760 hr/yr

INVENTORIES

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120002
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Air - Title V Regular Permit Minor Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Cathyval Plant						
EQT 0202	C-316 - Solvent 1 Cold Trap					8760 hr/yr
EQT 0203	C-320 - Guaiacol Distillation Reflux Drum					8760 hr/yr
EQT 0204	C-322X - Solvent 1 Vacuum Package Separator					8760 hr/yr
EQT 0205	H-317 - Vacuum System					8760 hr/yr
EQT 0206	C-407 - Oxidation Reactor					8760 hr/yr
EQT 0207	C-416 - Oxidation Column					8760 hr/yr
EQT 0208	C-429 - CO2 Separator					8760 hr/yr
EQT 0209	C-435 - Vanillin Extraction Column					8760 hr/yr
EQT 0210	C-440 - Solvent 2 Washing Column					8760 hr/yr
EQT 0211	C-504 - Vanillin/Solvent 2 Atm. Distillation Column					8760 hr/yr
EQT 0212	C-507 - Vanillin/Solvent 2 Vacuum Distillation Column					8760 hr/yr
EQT 0213	C-516 - Solvent 2 Cold Trap					8760 hr/yr
EQT 0214	C-533X - Solvent 2 Vacuum Package Separator					8760 hr/yr
EQT 0215	C-565 - Solvent 2 Recovery Column (Aqueous Phase Stripper)					8760 hr/yr
EQT 0216	C-568 - Solvent 2 Recovery Column (Top Rectification)					8760 hr/yr
EQT 0217	E-428 - Condenser					8760 hr/yr
EQT 0218	H-520 - Vacuum System					8760 hr/yr
EQT 0219	C-525 - Tars Removal Column					8760 hr/yr
EQT 0220	C-525 - Tars By-Pass Tank					8760 hr/yr
EQT 0221	C-545 - Lights Removal Column					8760 hr/yr
EQT 0222	C-555A/B - Vanillin Cold Traps					8760 hr/yr
EQT 0223	C-562X - Vanillin Purification Vacuum Package Separator					8760 hr/yr
EQT 0224	H-556 - Vacuum System					8760 hr/yr
EQT 0225	C-634X - Dryer Scrubber					8760 hr/yr
EQT 0226	C-637X - Crystallization Vacuum Package Separator					8760 hr/yr
EQT 0227	C-640 - Dryer					8760 hr/yr
EQT 0228	C-805 - Solvent 3 Recovery Column					8760 hr/yr
EQT 0229	H-619 - Vacuum System					8760 hr/yr
EQT 0230	Y-620 - Centrifuge A					8760 hr/yr
EQT 0231	Y-621 - Centrifuge B					8760 hr/yr
EQT 0232	Y-640 - Dryer					8760 hr/yr
EQT 0233	C-606 - Guaiacol Distillation Column					8760 hr/yr
EQT 0234	C-683X - Guaiacol Vacuum Package Separator					8760 hr/yr
EQT 0235	C-687A/B - Guaiacol Distillation Cold Traps					8760 hr/yr
EQT 0236	C-754 - Veratrole Distillation Column	450 gallons				8760 hr/yr
EQT 0237	C-783X - Veratrole Vacuum Separator					8760 hr/yr
EQT 0238	C-787 - Veratrole Distillation Cold Traps					8760 hr/yr
EQT 0239	C-213 - First Reactor					8760 hr/yr

INVENTORIES

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Cathyval Plant						
EQT 0240	C-215 - Second Reactor					8760 hr/yr
EQT 0241	C-217 - Third Reactor					8760 hr/yr
EQT 0242	C-219 - Fourth Reactor					8760 hr/yr
EQT 0243	C-231 - Fifth Reactor					8760 hr/yr
EQT 0244	C-501 - Detarring Column					8760 hr/yr
EQT 0245	C-521 - Final Dephenoling Column					8760 hr/yr
EQT 0246	E-418 - Phenol Condenser					8760 hr/yr
EQT 0247	H-524 - Vacuum System					8760 hr/yr
EQT 0248	C-301 - Water Stripper					8760 hr/yr
EQT 0249	C-313 - Extraction Column					8760 hr/yr
EQT 0250	C-405 - Dehydration Column					8760 hr/yr
EQT 0251	E-401 - Solvent Vent Condenser					8760 hr/yr
EQT 0252	C-536 - Splitter Column (PC/HQ Separation)					8760 hr/yr
EQT 0253	H-545 - Vacuum System					8760 hr/yr
EQT 0254	S-560 - PC Flaker					8760 hr/yr
EQT 0255	C-251 - Batch Reactor					8760 hr/yr
EQT 0256	H-640 - Vacuum System for Crystallizers					8760 hr/yr
EQT 0257	C-451 - Extraction Column					8760 hr/yr
EQT 0258	C-501 - Detheration Column					8760 hr/yr
EQT 0259	C-511 - Detheration Gualacol Decanter					8760 hr/yr
EQT 0260	C-551 - Crude Guaiacol Dehydration Column					8760 hr/yr
EQT 0261	C-555 - Wet Gualacol Tank					8760 hr/yr
EQT 0286	M-8A - Fire-Water Pump G972A		370 horsepower	370 horsepower		100 hr/yr
EQT 0287	M-8B - Fire-Water Pump G972B		370 horsepower	370 horsepower		100 hr/yr
EQT 0288	M-9 - Emergency Diesel Generator for Daphne/Vanessa Sump		500 horsepower	222 horsepower		400 hr/yr
EQT 0289	E-318 - Predephenoling Vent Condenser					8760 hr/yr
EQT 0290	E-506 - Detarring Condenser					8760 hr/yr
FUG 0001	F-6V - VANESSA FUGITIVE EMISSIONS					8760 hr/yr
FUG 0004	F-6C - CATHY FUGITIVE EMISSIONS					8760 hr/yr
FUG 0005	F-6D - DAPHNE FUGITIVE EMISSIONS					8760 hr/yr

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Cathyval Plant							
EQT 0009	101 - LIGHTS TANK FARM SCRUBBER C-165	7.5	22.1	.25		70	86
EQT 0015	102 - HEAVIES TANK FARM SCRUBBER C-187	7.5	159	.67		8	86

INVENTORIES

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120002
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Air - Title V Regular Permit Minor Mod

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Cathyal Plant							
EQT 0019	103 - CONDENSATION SCRUBBER C-201	5.4	15.9	.25		88	86
EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248	5.5	16.2	.25		70	86
EQT 0028	105 - OXIDATION SCRUBBER C-419	29.8	970	.83		70	86
EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427	30.4	90	.25		70	86
EQT 0040	107 - DISTILLATION SCRUBBER C-557	1.6	8.2	.33		70	86
EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624	5.6	16.5	.25		88	86
EQT 0051	109 - BAGHOUSE FILTER/SCRUBBER C-704	.75	7952	1.5		88	75
EQT 0052	201 - TANK FARM SCRUBBER C-146	5.4	15.9	.25		30	75
EQT 0056	202 - VENT SCRUBBER C-685	75.4	387	.33		85	75
EQT 0075	203 - BAGHOUSE FOR HQ HANDLING	37	435.9	.5		60	
EQT 0076	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)	9.45	28	.25		35	75
EQT 0082	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)	20.7	61	.25		32	75
EQT 0089	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)	7.5	22.1	.25		35	75
EQT 0094	304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)	2.7	7.95	.25		35	75
EQT 0097	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)	1.97	10.1	.33		70	75
EQT 0106	307 - SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601	34	400	.5		23	
EQT 0107	308 - OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)	34	400	.5		23	
EQT 0109	310 - CARBON BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)	34	400	.5		23	
EQT 0110	311 - PC PACKAGING BAGHOUSE Y-731 (P&I.D. F703)	42.5	500	.5		59	75
EQT 0111	312 - HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)	42.5	500	.5		59	75
EQT 0112	313 - HQ REWORK DUMPER BAGHOUSE S-693 FOR D607 (P&I.D. F602)	34	400	.5		59	75
EQT 0113	315A - FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)	44.2	2085	1		40	700
EQT 0114	315B - PRIMARY FLUID HEATER F-971 (P&I.D. F925)	28.6	3760	1.67		15.8	735
EQT 0115	316 - PRESSURE LEAF FILTER DRYING VENT Y-625	283	1452	.33		70	75
EQT 0116	317 - VACUUM CLEAN-UP PACKAGING BAGHOUSE Y-760X (P&I.D. F703)	7.64	360	1		60	75
EQT 0118	401A - WWT TANK NO. 28 (P&I.D. F101)	.8	6	.3		45.5	70
EQT 0119	401B - STORMWATER TANK NO. 29 (P&I.D. F101)	.8	6	.3		43.5	70
EQT 0120	401C - TANK D-197	0	.02	.33		16	70
EQT 0121	402A - WEST AERATION BASIN D210					20	
EQT 0122	402B - EAST AERATION BASIN D213 (P&I.D. F201)					20	

INVENTORIES

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Cathyval Plant							
EQT 0123	402C - WEST CLARIFIER D301 (P&I.D. F302)					14	
EQT 0124	402D - EAST CLARIFIER D304 (P&I.D. F302)					14	
EQT 0125	M-5 - CATHY (E925) AND VANESSA (E907) COOLING TOWERS (P&I.D. F903)						
EQT 0126	M-6 - CATHYVAL SUMPS						
EQT 0139	110 - HIGH PURITY PC MIXING VESSEL	61	20	.08		32	120
EQT 0286	M-8A - Fire-Water Pump G972A	20.4	240	.5		10.6	604
EQT 0287	M-8B - Fire-Water Pump G972B	20.4	240	.5		10.6	604
EQT 0288	M-9 - Emergency Diesel Generator for Daphne/Vanessa Sump	32	377	.5		11.8	285
FUG 0001	F-6V - VANESSA FUGITIVE EMISSIONS						
FUG 0004	F-6C - CATHY FUGITIVE EMISSIONS						
FUG 0005	F-6D - DAPHNE FUGITIVE EMISSIONS						
GRP 0014	WWT - EMISSIONS CAP - WW TREATMENT PLANT						

Relationships:

ID	Description	Relationship	ID	Description
EQT 0010	D-148 - VANILLIN SOLVENT 1 TANK (MIBK STORAGE) D-148	Controlled by	EQT 0009	101 - LIGHTS TANK FARM SCRUBBER C-165
EQT 0011	D-149 - ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)	Controlled by	EQT 0009	101 - LIGHTS TANK FARM SCRUBBER C-165
EQT 0012	D-152 - SOLVENT 2 TANK (MIBK STORAGE) D-152	Controlled by	EQT 0009	101 - LIGHTS TANK FARM SCRUBBER C-165
EQT 0013	D-153 - SOLVENT 2 TANK (MIBK STORAGE) D-153	Controlled by	EQT 0009	101 - LIGHTS TANK FARM SCRUBBER C-165
EQT 0014	D-169 - SOLVENT 3 TANK (METHANOL STORAGE) D-169	Controlled by	EQT 0009	101 - LIGHTS TANK FARM SCRUBBER C-165
EQT 0016	D-107 (Vanessa) - GUAIACOL STORAGE TANK D-107	Controlled by	EQT 0015	102 - HEAVIES TANK FARM SCRUBBER C-187
EQT 0017	D-111 (Vanessa) - GUETOL STORAGE TANK D-111	Controlled by	EQT 0015	102 - HEAVIES TANK FARM SCRUBBER C-187
EQT 0018	D-113 (Vanessa) - GLYOXYLIC ACID STORAGE TANK D-113	Controlled by	EQT 0015	102 - HEAVIES TANK FARM SCRUBBER C-187
EQT 0020	C-216 - GUAIACOL RECYCLE TANK C-216	Controlled by	EQT 0019	103 - CONDENSATION SCRUBBER C-201
EQT 0022	C-236 - NEUTRALIZATION SURGE TANK C-236	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0023	C-240 - EXTRACTOR TAILS UPSET TANK C-240	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0024	C-243 - EXTRACTOR 1 TAILS SAFETY DECANTER C-243	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0025	C-244 - MANDELATE SURGE TANK C-244	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0026	C-249 - SOLVENT 1 SURGE TANK C-249	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0027	C-247 - SOLVENT 1 WASHING SAFETY DECANTER C-247	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0029	C-409 - MANDELATE SURGE TANK C-409	Controlled by	EQT 0028	105 - OXIDATION SCRUBBER C-419
EQT 0030	C-417 - OXIDATION SURGE TANK D-417	Controlled by	EQT 0028	105 - OXIDATION SCRUBBER C-419
EQT 0032	C-421 - SOLVENT 2 SURGE TANK C-421	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427

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Relationships:

ID	Description	Relationship	ID	Description
EQT 0033	C-430 - SOLVENT 2 DECANter C-430	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0034	C-432 - EXTRACTION 2 DRAIN TANK C-432	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0035	C-434 - EXTRACTION 2 TAILS SAFETY DECANter C-434	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0036	C-441 - AQUEOUS PHASE SURGE TANK C-441	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0037	C-501 - SOLVENT 2 DISTILLATION SURGE TANK C-501	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0038	C-558 - AQUEOUS EFFLUENTS TANK C-558	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0039	C-575 - SOLVENT 2 RECOVERY DECANter C-575	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0041	C-535 - TARS SURGE TANK C-535	Controlled by	EQT 0040	107 - DISTILLATION SCRUBBER C-557
EQT 0042	C-616 - FLAKER SURGE TANK C-616	Controlled by	EQT 0040	107 - DISTILLATION SCRUBBER C-557
EQT 0043	C-648 - RECYCLE PRODUCT HOPPER MELTER C-648	Controlled by	EQT 0040	107 - DISTILLATION SCRUBBER C-557
EQT 0044	C-655 - MELTER SURGE TANK C-655	Controlled by	EQT 0040	107 - DISTILLATION SCRUBBER C-557
EQT 0046	C-541 - METHANOL WASHING DRUM C-541 (Vents through C-801)	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0047	C-801 - SOLVENT 3 RECOVERY FEED TANK C-801	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0048	C-603 - DISOLVER C-603	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0049	C-606 - VACUUM CRYSTALLIZER C-606	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0050	C-617 - CENTRIFUGE SURGE TANK C-617	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0053	D-111 (Daphne) - PYROCATECHOL STORAGE TANK	Controlled by	EQT 0052	201 - TANK FARM SCRUBBER C-146
EQT 0054	D-128 - TARS STORAGE TANK D-128	Controlled by	EQT 0052	201 - TANK FARM SCRUBBER C-146
EQT 0055	D-141 - VERATROLE STORAGE TANK D-141	Controlled by	EQT 0052	201 - TANK FARM SCRUBBER C-146
EQT 0057	C-201 - PC DISSOLUTION TANK C-201	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0058	C-553 - GUAICOL DISTILLATION FEED TANK C-553	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0059	C-561 - RECYCLE PROCESS WATER TANK C-561	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0060	C-603 - GUAICOL DISTILLATION KETTLE C-603	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0061	C-615 - TARS RECEIVER C-615	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0062	C-645 - PMDB RECEIVER C-645	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0063	C-651 - PC RECEIVER C-651	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0064	C-655 - GUAICOL LT. ENDS RECEIVER C-655	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0065	C-660 - INTERS./VERATROLE RECEIVER C-660	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0066	C-665 - SECOND RECEIVER C-665	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0067	C-670 - END OF CAMPAIGN RECEIVER C-670	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0068	C-675 - GUAICOL RECEIVER C-675	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0069	C-701 - CRUDE VERATROLE WASH TANK C-701	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0070	C-705 - WATER GUAICOLATE RECEIVER C-705	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0071	C-710 - CAUSTIC WASH RECEIVER C-710	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0072	C-751 - VERATROLE DISTILLATION KETTLE C-751	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0073	C-765 - LT. ENDS RECEIVER C-765	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685

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Relationships:

ID	Description	Relationship	ID	Description
EQT 0074	C-770 - DISTILLED VERATROLE RECEIVER C-770	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0077	C-223 - PHENOL DRAIN TANK REACTION SURGE DRUM C-223	Controlled by	EQT 0076	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0078	C-416 - PREDEPHENOL REFLUX DRUM C-416	Controlled by	EQT 0076	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0079	C-508 - VERTICAL TAR DILUTER C-508	Controlled by	EQT 0076	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0080	C-530 - DISTILLATION DRAN TANK C-530	Controlled by	EQT 0076	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0081	C-532 - TAILS SURGE DRUM C-532	Controlled by	EQT 0076	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0083	C-113 - PHENOL UNLOADING TANK C-113	Controlled by	EQT 0082	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0084	D-107 - WASHWATER TANK D-107	Controlled by	EQT 0082	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0085	D-111 - PHENOL MAKE-UP TANK D-111	Controlled by	EQT 0082	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0086	D-115 - WASHWATER/GUAIACOL TANK D-115	Controlled by	EQT 0082	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0087	D-315 - RAFFINATE TANK D-315	Controlled by	EQT 0082	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0088	D-204 - RECYCLE PHENOL TANK D-204	Controlled by	EQT 0082	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0090	C-320 - IPE STORAGE TANK C-320	Controlled by	EQT 0089	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0091	C-308 - IPE SETTLER C-308	Controlled by	EQT 0089	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0092	C-311 - WASHWATER DRUM C-311	Controlled by	EQT 0089	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0093	C-322 - ETHER DRAIN TANK C-322	Controlled by	EQT 0089	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0095	C-551 - PC RECEIVING DRUM C-551	Controlled by	EQT 0094	304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)
EQT 0096	C-563 - PC FLAKER FEED TANK C-563	Controlled by	EQT 0094	304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)
EQT 0098	C-650 - REFLUX SURGE DRUM C-650	Controlled by	EQT 0097	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0099	D-607 - HQ DISSOLVER TANK D-607	Controlled by	EQT 0097	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0100	D-610 - HQ SURGE TANK D-610	Controlled by	EQT 0097	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0101	D-612 - CARBON TREATER TANK D-612	Controlled by	EQT 0097	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0102	D-632 - CRYSTALLIZATION TANK D-632	Controlled by	EQT 0097	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0103	D-652 - MOTHER LIQUOR SURGE TANK D-652	Controlled by	EQT 0097	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0104	D-653 - CONC. COLUMN FEED TANK D-653	Controlled by	EQT 0097	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0105	D-657 - MOTHER LIQUOR SURGE DRUM D-657	Controlled by	EQT 0097	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0188	C-202 - Premixing Reactor	Controlled by	EQT 0019	103 - CONDENSATION SCRUBBER C-201
EQT 0189	C-207 - Veratrole Stripper	Controlled by	EQT 0019	103 - CONDENSATION SCRUBBER C-201
EQT 0190	C-217 - No. 1 Condensation Reactor	Controlled by	EQT 0019	103 - CONDENSATION SCRUBBER C-201
EQT 0191	C-219 - No. 2 Condensation Reactor	Controlled by	EQT 0019	103 - CONDENSATION SCRUBBER C-201
EQT 0192	C-221 - No. 3 Condensation Reactor	Controlled by	EQT 0019	103 - CONDENSATION SCRUBBER C-201
EQT 0193	C-223 - No. 4 Condensation Reactor	Controlled by	EQT 0019	103 - CONDENSATION SCRUBBER C-201
EQT 0194	C-225 - No. 5 Condensation Reactor	Controlled by	EQT 0019	103 - CONDENSATION SCRUBBER C-201

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Relationships:

ID	Description	Relationship	ID	Description
EQT 0195	C-227 - Polishing Reactor	Controlled by	EQT 0019	103 - CONDENSATION SCRUBBER C-201
EQT 0196	C-241 - Guaiacol Extraction Column	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0197	C-245 - Solvent 1 Washing Column	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0198	C-301 - Guaiacol Recovery Column	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0199	C-306 - Guaiacol/Tars Separator	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0200	C-312 - Solvent 1 Stripper Decanter	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0201	C-314 - Solvent 1 Stripper	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0202	C-316 - Solvent 1 Cold Trap	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0203	C-320 - Guaiacol Distillation Reflux Drum	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0204	C-322X - Solvent 1 Vacuum Package Separator	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0205	H-317 - Vacuum System	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0206	C-407 - Oxidation Reactor	Controlled by	EQT 0028	105 - OXIDATION SCRUBBER C-419
EQT 0207	C-416 - Oxidation Column	Controlled by	EQT 0028	105 - OXIDATION SCRUBBER C-419
EQT 0208	C-429 - CO2 Separator	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0209	C-435 - Vanillin Extraction Column	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0210	C-440 - Solvent 2 Washing Column	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0211	C-504 - Vanillin/Solvent 2 Atm. Distillation Column	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0212	C-507 - Vanillin/Solvent 2 Vacuum Distillation Column	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0213	C-516 - Solvent 2 Cold Trap	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0214	C-533X - Solvent 2 Vacuum Package Separator	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0215	C-565 - Solvent 2 Recovery Column (Aqueous Phase Stripper)	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0216	C-568 - Solvent 2 Recovery Column (Top Rectification)	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0217	E-428 - Condenser	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0218	H-520 - Vacuum System	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0219	C-525 - Tars Removal Column	Controlled by	EQT 0040	107 - DISTILLATION SCRUBBER C-557
EQT 0220	C-525 - Tars By-Pass Tank	Controlled by	EQT 0040	107 - DISTILLATION SCRUBBER C-557
EQT 0221	C-545 - Lights Removal Column	Controlled by	EQT 0040	107 - DISTILLATION SCRUBBER C-557
EQT 0222	C-555A/B - Vanillin Cold Traps	Controlled by	EQT 0040	107 - DISTILLATION SCRUBBER C-557
EQT 0223	C-562X - Vanillin Purification Vacuum Package Separator	Controlled by	EQT 0040	107 - DISTILLATION SCRUBBER C-557
EQT 0224	H-556 - Vacuum System	Controlled by	EQT 0040	107 - DISTILLATION SCRUBBER C-557
EQT 0225	C-634X - Dryer Scrubber	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0226	C-637X - Crystallization Vacuum Package Separator	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0227	C-640 - Dryer	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0228	C-805 - Solvent 3 Recovery Column	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0229	H-619 - Vacuum System	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0230	Y-620 - Centrifuge A	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624

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Relationships:

ID	Description	Relationship	ID	Description
EQT 0231	Y-621 - Centrifuge B	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0232	Y-640 - Dryer	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0233	C-606 - Guaiacol Distillation Column	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0234	C-683X - Guaiacol Vacuum Package Separator	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0235	C-687A/B - Guaiacol Distillation Cold Traps	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0236	C-754 - Veratrole Distillation Column	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0237	C-783X - Veratrole Vacuum Separator	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0238	C-787 - Veratrole Distillation Cold Traps	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0239	C-213 - First Reactor	Controlled by	EQT 0076	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0240	C-215 - Second Reactor	Vents to	EQT 0239	C-213 - First Reactor
EQT 0241	C-217 - Third Reactor	Vents to	EQT 0243	C-231 - Fifth Reactor
EQT 0242	C-219 - Fourth Reactor	Vents to	EQT 0241	C-217 - Third Reactor
EQT 0243	C-231 - Fifth Reactor	Vents to	EQT 0240	C-215 - Second Reactor
EQT 0244	C-501 - Detarring Column	Vents to	EQT 0247	H-524 - Vacuum System
EQT 0245	C-521 - Final Dephenolizing Column	Vents to	EQT 0247	H-524 - Vacuum System
EQT 0246	E-418 - Phenol Condenser	Controlled by	EQT 0076	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0247	H-524 - Vacuum System	Controlled by	EQT 0076	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0248	C-301 - Water Stripper	Controlled by	EQT 0089	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0249	C-313 - Extraction Column	Controlled by	EQT 0089	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0250	C-405 - Dehydration Column	Controlled by	EQT 0089	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0251	E-401 - Solvent Vent Condenser	Controlled by	EQT 0089	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0252	C-536 - Splitter Column (PC/HQ Separation)	Controlled by	EQT 0094	304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)
EQT 0253	H-545 - Vacuum System	Controlled by	EQT 0094	304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)
EQT 0254	S-560 - PC Flaker	Controlled by	EQT 0094	304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)
EQT 0256	H-640 - Vacuum System for Crystallizers	Vents to	EQT 0097	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)

Subject Item Groups:

ID	Group Type	Group Description
GRP 0006	Equipment Group	- Cathy
GRP 0012	Equipment Group	- Daphne
GRP 0013	Equipment Group	- Vanessa
GRP 0014	Equipment Group	WWT - EMISSIONS CAP - WW TREATMENT PLANT
GRP 0022	Equipment Group	Fire Pump Diesel Engines - Fire Pump Diesel Engines
UNF 0001	Unit or Facility Wide	- Cathyval Plant

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Group Membership:

ID	Description	Member of Groups
EQT 0009	101 - LIGHTS TANK FARM SCRUBBER C-165	GRP0000000013
EQT 0010	D-148 - VANILLIN SOLVENT 1 TANK (MIBK STORAGE) D-148	GRP0000000013
EQT 0011	D-149 - ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)	GRP0000000013
EQT 0012	D-152 - SOLVENT 2 TANK (MIBK STORAGE) D-152	GRP0000000013
EQT 0013	D-153 - SOLVENT 2 TANK (MIBK STORAGE) D-153	GRP0000000013
EQT 0014	D-169 - SOLVENT 3 TANK (METHANOL STORAGE) D-169	GRP0000000013
EQT 0015	102 - HEAVIES TANK FARM SCRUBBER C-187	GRP0000000013
EQT 0016	D-107 (Vanessa) - GUAIACOL STORAGE TANK D-107	GRP0000000013
EQT 0017	D-111 (Vanessa) - GUETOL STORAGE TANK D-111	GRP0000000013
EQT 0018	D-113 (Vanessa) - GLYOXYLIC ACID STORAGE TANK D-113	GRP0000000013
EQT 0019	103 - CONDENSATION SCRUBBER C-201	GRP0000000013
EQT 0020	C-216 - GUAIACOL RECYCLE TANK C-216	GRP0000000013
EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248	GRP0000000013
EQT 0022	C-236 - NEUTRALIZATION SURGE TANK C-236	GRP0000000013
EQT 0023	C-240 - EXTRACTOR TAILS UPSET TANK C-240	GRP0000000013
EQT 0024	C-243 - EXTRACTOR 1 TAILS SAFETY DECANter C-243	GRP0000000013
EQT 0025	C-244 - MANDELATE SURGE TANK C-244	GRP0000000013
EQT 0026	C-249 - SOLVENT 1 SURGE TANK C-249	GRP0000000013
EQT 0027	C-247 - SOLVENT 1 WASHING SAFETY DECANter C-247	GRP0000000013
EQT 0028	105 - OXIDATION SCRUBBER C-419	GRP0000000013
EQT 0029	C-409 - MANDELATE SURGE TANK C-409	GRP0000000013
EQT 0030	C-417 - OXIDATION SURGE TANK D-417	GRP0000000013
EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427	GRP0000000013
EQT 0032	C-421 - SOLVENT 2 SURGE TANK C-421	GRP0000000013
EQT 0033	C-430 - SOLVENT 2 DECANter C-430	GRP0000000013
EQT 0034	C-432 - EXTRACTION 2 DRAIN TANK C-432	GRP0000000013
EQT 0035	C-434 - EXTRACTION 2 TAILS SAFETY DECANter C-434	GRP0000000013
EQT 0036	C-441 - AQUEOUS PHASE SURGE TANK C-441	GRP0000000013
EQT 0037	C-501 - SOLVENT 2 DISTILLATION SURGE TANK C-501	GRP0000000013
EQT 0038	C-558 - AQUEOUS EFFLUENTS TANK C-558	GRP0000000013
EQT 0039	C-575 - SOLVENT 2 RECOVERY DECANter C-575	GRP0000000013
EQT 0040	107 - DISTILLATION SCRUBBER C-557	GRP0000000013
EQT 0041	C-535 - TARS SURGE TANK C-535	GRP0000000013
EQT 0042	C-616 - FLAKER SURGE TANK C-616	GRP0000000013
EQT 0043	C-648 - RECYCLE PRODUCT HOPPER MELTER C-648	GRP0000000013
EQT 0044	C-655 - MELTER SURGE TANK C-655	GRP0000000013
EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624	GRP0000000013
EQT 0046	C-541 - METHANOL WASHING DRUM C-541 (Vents through C-801)	GRP0000000013
EQT 0047	C-801 - SOLVENT 3 RECOVERY FEED TANK C-801	GRP0000000013
EQT 0048	C-603 - DISOLVER C-603	GRP0000000013
EQT 0049	C-606 - VACUUM CRYSTALLIZER C-606	GRP0000000013

INVENTORIES

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

Group Membership:

ID	Description	Member of Groups
EQT 0050	C-617 - CENTRIFUGE SURGE TANK C-617	GRP0000000013
EQT 0051	109 - BAGHOUSE FILTER/SCRUBBER C-704	GRP0000000013
EQT 0052	201 - TANK FARM SCRUBBER C-146	GRP0000000012
EQT 0053	D-111 (Daphne) - PYROCATECHOL STORAGE TANK	GRP0000000012
EQT 0055	D-141 - VERATROLE STORAGE TANK D-141	GRP0000000012
EQT 0057	C-201 - PC DISSOLUTION TANK C-201	GRP0000000012
EQT 0058	C-553 - GUAICOL DISTILLATION FEED TANK C-553	GRP0000000012
EQT 0059	C-561 - RECYCLE PROCESS WATER TANK C-561	GRP0000000012
EQT 0060	C-603 - GUAICOL DISTILLATION KETTLE C-603	GRP0000000012
EQT 0061	C-615 - TARS RECEIVER C-615	GRP0000000012
EQT 0062	C-645 - PMDB RECEIVER C-645	GRP0000000012
EQT 0063	C-651 - PC RECEIVER C-651	GRP0000000012
EQT 0064	C-655 - GUAICOL LT. ENDS RECEIVER C-655	GRP0000000012
EQT 0065	C-660 - INTERS./VERATROLE RECEIVER C-660	GRP0000000012
EQT 0066	C-665 - SECOND RECEIVER C-665	GRP0000000012
EQT 0067	C-670 - END OF CAMPAIGN RECEIVER C-670	GRP0000000012
EQT 0068	C-675 - GUAICOL RECEIVER C-675	GRP0000000012
EQT 0069	C-701 - CRUDE VERATROLE WASH TANK C-701	GRP0000000012
EQT 0070	C-705 - WATER GUAICOLATE RECEIVER C-705	GRP0000000012
EQT 0071	C-710 - CAUSTIC WASH RECEIVER C-710	GRP0000000012
EQT 0072	C-751 - VERATROLE DISTILLATION KETTLE C-751	GRP0000000012
EQT 0073	C-765 - LT. ENDS RECEIVER C-765	GRP0000000012
EQT 0074	C-770 - DISTILLED VERATROLE RECEIVER C-770	GRP0000000012
EQT 0076	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)	GRP0000000006
EQT 0077	C-223 - PHENOL DRAIN TANK REACTION SURGE DRUM C-223	GRP0000000006
EQT 0078	C-416 - PREDEPHENOL REFLUX DRUM C-416	GRP0000000006
EQT 0079	C-508 - VERTICAL TAR DILUTER C-508	GRP0000000006
EQT 0080	C-530 - DISTILLATION DRAN TANK C-530	GRP0000000006
EQT 0081	C-532 - TAILS SURGE DRUM C-532	GRP0000000006
EQT 0083	C-113 - PHENOL UNLOADING TANK C-113	GRP0000000006
EQT 0084	D-107 - WASHWATER TANK D-107	GRP0000000006
EQT 0085	D-111 - PHENOL MAKE-UP TANK D-111	GRP0000000006
EQT 0086	D-115 - WASHWATER/GUAICOL TANK D-115	GRP0000000006
EQT 0087	D-315 - RAFFINATE TANK D-315	GRP0000000006
EQT 0088	D-204 - RECYCLE PHENOL TANK D-204	GRP0000000006
EQT 0090	C-320 - IPE STORAGE TANK C-320	GRP0000000006
EQT 0091	C-308 - IPE SETTLER C-308	GRP0000000006
EQT 0092	C-311 - WASHWATER DRUM C-311	GRP0000000006
EQT 0093	C-322 - ETHER DRAIN TANK C-322	GRP0000000006
EQT 0095	C-551 - PC RECEIVING DRUM C-551	GRP0000000006
EQT 0096	C-563 - PC FLAKER FEED TANK C-563	GRP0000000006

INVENTORIES

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

Group Membership:

ID	Description	Member of Groups
EQT 0098	C-650 - REFLUX SURGE DRUM C-650	GRP0000000006
EQT 0099	D-607 - HQ DISSOLVER TANK D-607	GRP0000000006
EQT 0100	D-610 - HQ SURGE TANK D-610	GRP0000000006
EQT 0101	D-612 - CARBON TREATER TANK D-612	GRP0000000006
EQT 0102	D-632 - CRYSTALLIZATION TANK D-632	GRP0000000006
EQT 0103	D-652 - MOTHER LIQUOR SURGE TANK D-652	GRP0000000006
EQT 0104	D-653 - CONC. COLUMN FEED TANK D-653	GRP0000000006
EQT 0105	D-657 - MOTHER LIQUOR SURGE DRUM D-657	GRP0000000006
EQT 0106	307 - SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601	GRP0000000006
EQT 0107	308 - OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)	GRP0000000006
EQT 0109	310 - CARBON BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)	GRP0000000006
EQT 0110	311 - PC PACKAGING BAGHOUSE Y-731 (P&I.D. F703)	GRP0000000006
EQT 0111	312 - HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)	GRP0000000006
EQT 0112	313 - HQ REWORK DUMPER BAGHOUSE S-693 FOR D607 (P&I.D. F602)	GRP0000000006
EQT 0113	315A - FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)	GRP0000000006
EQT 0114	315B - PRIMARY FLUID HEATER F-971 (P&I.D. F925)	GRP0000000006
EQT 0115	316 - PRESSURE LEAF FILTER DRYING VENT Y-625	GRP0000000006
EQT 0116	317 - VACUUM CLEAN-UP PACKAGING BAGHOUSE Y-760X (P&I.D. F703)	GRP0000000006
EQT 0118	401A - WWT TANK NO. 28 (P&I.D. F101)	GRP0000000014
EQT 0119	401B - STORMWATER TANK NO. 29 (P&I.D. F101)	GRP0000000014
EQT 0120	401C - TANK D-197	GRP0000000014
EQT 0121	402A - WEST AERATION BASIN D210	GRP0000000014
EQT 0122	402B - EAST AERATION BASIN D213 (P&I.D. F201)	GRP0000000014
EQT 0123	402C - WEST CLARIFIER D301 (P&I.D. F302)	GRP0000000014
EQT 0124	402D - EAST CLARIFIER D304 (P&I.D. F302)	GRP0000000014
EQT 0127	C-101 - IPE SOLVENT STORAGE TANK C-101	GRP0000000012
EQT 0128	C-351 - RAG LAYER DIVERTING TANK C-351	GRP0000000012
EQT 0129	C-401 - AQUEOUS PHASE SURGE TANK C-401	GRP0000000012
EQT 0130	C-352 - RAG LAYER SURGE TANK C-352	GRP0000000012
EQT 0131	C-461 - AQUEOUS EFFLUENT TANK C-461	GRP0000000012
EQT 0132	C-521 - ORGANIC PHASE SURGE TANK C-521	GRP0000000012
EQT 0133	C-132 - MeCl STORAGE TANK C-132	GRP0000000012
EQT 0134	C-136 - EtCl STORAGE TANK C-136	GRP0000000012
EQT 0135	C-301 - ACIDIFICATION/DECANTATION TANK C-301	GRP0000000012
EQT 0136	C-503 - DEETHERATION IPE DECANter C-503	GRP0000000012
EQT 0137	D-681 - SCREENER RESIDUE DISSOLVER D-681	GRP0000000006
EQT 0139	110 - HIGH PURITY PC MIXING VESSEL	GRP0000000006
EQT 0188	C-202 - Premixing Reactor	GRP0000000013
EQT 0189	C-207 - Veratrole Stripper	GRP0000000013
EQT 0190	C-217 - No. 1 Condensation Reactor	GRP0000000013
EQT 0191	C-219 - No. 2 Condensation Reactor	GRP0000000013

INVENTORIES

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

Group Membership:

ID	Description	Member of Groups
EQT 0192	C-221 - No. 3 Condensation Reactor	GRP0000000013
EQT 0193	C-223 - No. 4 Condensation Reactor	GRP0000000013
EQT 0194	C-225 - No. 5 Condensation Reactor	GRP0000000013
EQT 0195	C-227 - Polishing Reactor	GRP0000000013
EQT 0196	C-241 - Guaiacol Extraction Column	GRP0000000013
EQT 0197	C-245 - Solvent 1 Washing Column	GRP0000000013
EQT 0198	C-301 - Guaiacol Recovery Column	GRP0000000013
EQT 0199	C-306 - Guaiacol/Tars Separator	GRP0000000013
EQT 0200	C-312 - Solvent 1 Stripper Decanter	GRP0000000013
EQT 0201	C-314 - Solvent 1 Stripper	GRP0000000013
EQT 0202	C-316 - Solvent 1 Cold Trap	GRP0000000013
EQT 0203	C-320 - Guaiacol Distillation Reflux Drum	GRP0000000013
EQT 0204	C-322X - Solvent 1 Vacuum Package Separator	GRP0000000013
EQT 0205	H-317 - Vacuum System	GRP0000000013
EQT 0206	C-407 - Oxidation Reactor	GRP0000000013
EQT 0207	C-416 - Oxidation Column	GRP0000000013
EQT 0208	C-429 - CO2 Separator	GRP0000000013
EQT 0209	C-435 - Vanillin Extraction Column	GRP0000000013
EQT 0210	C-440 - Solvent 2 Washing Column	GRP0000000013
EQT 0211	C-504 - Vanillin/Solvent 2 Atm. Distillation Column	GRP0000000013
EQT 0212	C-507 - Vanillin/Solvent 2 Vacuum Distillation Column	GRP0000000013
EQT 0213	C-516 - Solvent 2 Cold Trap	GRP0000000013
EQT 0214	C-533X - Solvent 2 Vacuum Package Separator	GRP0000000013
EQT 0215	C-565 - Solvent 2 Recovery Column (Aqueous Phase Stripper)	GRP0000000013
EQT 0216	C-568 - Solvent 2 Recovery Column (Top Rectification)	GRP0000000013
EQT 0217	E-428 - Condenser	GRP0000000013
EQT 0218	H-520 - Vacuum System	GRP0000000013
EQT 0219	C-525 - Tars Removal Column	GRP0000000013
EQT 0220	C-525 - Tars By-Pass Tank	GRP0000000013
EQT 0221	C-545 - Lights Removal Column	GRP0000000013
EQT 0222	C-555A/B - Vanillin Cold Traps	GRP0000000013
EQT 0223	C-562X - Vanillin Purification Vacuum Package Separator	GRP0000000013
EQT 0224	H-556 - Vacuum System	GRP0000000013
EQT 0225	C-634X - Dryer Scrubber	GRP0000000013
EQT 0226	C-637X - Crystallization Vacuum Package Separator	GRP0000000013
EQT 0227	C-640 - Dryer	GRP0000000013
EQT 0228	C-805 - Solvent 3 Recovery Column	GRP0000000013
EQT 0229	H-619 - Vacuum System	GRP0000000013
EQT 0230	Y-620 - Centrifuge A	GRP0000000013
EQT 0231	Y-621 - Centrifuge B	GRP0000000013
EQT 0232	Y-640 - Dryer	GRP0000000013

INVENTORIES

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120002
Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

Group Membership:

ID	Description	Member of Groups
EQT 0233	C-606 - Guaiacol Distillation Column	GRP0000000012
EQT 0234	C-683X - Guaiacol Vacuum Package Separator	GRP0000000012
EQT 0235	C-687A/B - Guaiacol Distillation Cold Traps	GRP0000000012
EQT 0236	C-754 - Veratrole Distillation Column	GRP0000000012
EQT 0237	C-783X - Veratrole Vacuum Separator	GRP0000000012
EQT 0238	C-787 - Veratrole Distillation Cold Traps	GRP0000000012
EQT 0239	C-213 - First Reactor	GRP0000000006
EQT 0240	C-215 - Second Reactor	GRP0000000006
EQT 0241	C-217 - Third Reactor	GRP0000000006
EQT 0242	C-219 - Fourth Reactor	GRP0000000006
EQT 0243	C-231 - Fifth Reactor	GRP0000000006
EQT 0244	C-501 - Detarring Column	GRP0000000006
EQT 0245	C-521 - Final Dephenoling Column	GRP0000000006
EQT 0246	E-418 - Phenol Condenser	GRP0000000006
EQT 0247	H-524 - Vacuum System	GRP0000000006
EQT 0248	C-301 - Water Stripper	GRP0000000006
EQT 0249	C-313 - Extraction Column	GRP0000000006
EQT 0250	C-405 - Dehydration Column	GRP0000000006
EQT 0251	E-401 - Solvent Vent Condenser	GRP0000000006
EQT 0252	C-536 - Splitter Column (PC/HQ Separation)	GRP0000000006
EQT 0253	H-545 - Vacuum System	GRP0000000006
EQT 0254	S-560 - PC Flaker	GRP0000000006
EQT 0255	C-251 - Batch Reactor	GRP0000000012
EQT 0256	H-640 - Vacuum System for Crystallizers	GRP0000000006
EQT 0257	C-451 - Extraction Column	GRP0000000012
EQT 0258	C-501 - Detheration Column	GRP0000000012
EQT 0259	C-511 - Detheration Guaiacol Decanter	GRP0000000012
EQT 0260	C-551 - Crude Guaiacol Dehydration Column	GRP0000000012
EQT 0261	C-555 - Wet Guaiacol Tank	GRP0000000012
EQT 0286	M-8A - Fire-Water Pump G972A	GRP0000000022
EQT 0287	M-8B - Fire-Water Pump G972B	GRP0000000022
FUG 0001	F-6V - VANESSA FUGITIVE EMISSIONS	GRP0000000013
FUG 0004	F-6C - CATHY FUGITIVE EMISSIONS	GRP0000000006
FUG 0005	F-6D - DAPHNE FUGITIVE EMISSIONS	GRP0000000012

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0630	0630 Organic Oxides, Alcohols, Glycols (Rated Capacity)	88	MM lbs/yr

INVENTORIES

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

SIC Codes:

2869	Industrial organic chemicals, nec	AI 1314
2869	Industrial organic chemicals, nec	UNF 001

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO2e

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

Subject Item	CO			NOx			PM10			SO2		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Cathval Plant												
EQT 0009 101												
EQT 0015 102												
EQT 0019 103												
EQT 0021 104												
EQT 0028 105												
EQT 0031 106												
EQT 0040 107												
EQT 0046 108												
EQT 0051 109							0.02	0.03	0.07			
EQT 0056 110												
EQT 0059 111												
EQT 0063 112												
EQT 0069 113												
EQT 0075 203							0.04	0.09	0.02			
EQT 0076 301												
EQT 0082 302												
EQT 0089 303												
EQT 0094 304												
EQT 0097 305												
EQT 0106 307							0.001	0.002	<0.01			
EQT 0107 308							0.001	0.002	<0.01			
EQT 0109 310							0.001	0.001	<0.01			
EQT 0110 311							0.05	0.10	0.22			
EQT 0111 312							0.05	0.10	0.22			
EQT 0112 313							0.01	0.01	0.02			

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO2e

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

Subject Item	VOC		
	Avg lb/hr	Max lb/hr	Tons/Year
Cathyval Plant			
EQT 0009 101	0.04		0.16
EQT 0015 102	0.001		0.01
EQT 0019 103	0.01	0.02	0.05
EQT 0021 104	0.03	0.03	0.12
EQT 0028 105	0.12	0.18	0.53
EQT 0031 106	0.21	0.82	0.90
EQT 0040 107	<0.001	0.10	0.01
EQT 0045 108	0.002	0.002	0.01
EQT 0051 109			
EQT 0052 201	0.01		0.04
EQT 0056 202	0.16	1.12	0.78
EQT 0075 203			
EQT 0076 301	0.01	1.11	0.06
EQT 0082 302	0.20	13.51	0.88
EQT 0089 303	0.82	8.21	3.68
EQT 0094 304	0.01	0.30	0.06
EQT 0097 306	0.02	0.03	0.06
EQT 0106 307			
EQT 0107 308			
EQT 0109 310			
EQT 0110 311			
EQT 0111 312			
EQT 0112 313			

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO₂e

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

Subject Item	CO			NOx			PM10			SO2		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Cathyval Plant												
EQT 0113 315A	0.48	0.48	0.73	0.58	0.58	0.87	0.04	0.04	0.07	0.003	0.003	0.01
EQT 0114 315B	0.65	0.65	2.83	0.77	0.77	3.37	0.06	0.06	0.26	0.005	0.005	0.02
EQT 0115 316												
EQT 0116 317							<0.001	0.40	<0.01			
EQT 0125 M-5							0.21		0.92			
EQT 0126 M-6												
EQT 0139 110												
EQT 0288 M-9	1.48	1.48	0.30	6.88	6.88	1.38	0.49	0.49	0.10	0.46	0.46	0.09
FUG 0001 F-6V												
FUG 0004 F-6C												
FUG 0005 F-6D												
GRP 0014 WWT												
GRP 0022 Fire Pump Diesel Engine	2.47	2.47	0.12	11.47	11.47	0.57	0.81	0.81	0.04	0.76	0.76	0.04

EMISSION RATES FOR CRITERIA POLLUTANTS AND CO₂e

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

Subject Item	VOC		
	Avg lb/hr	Max lb/hr	Tons/Year
Cathayval Plant			
EQT 0113 315A	0.03	0.03	0.05
EQT 0114 315B	0.04	0.04	0.19
EQT 0115 316	<0.001	0.004	<0.01
EQT 0116 317			
EQT 0125 M-5			
EQT 0126 M-5	0.005		0.02
EQT 0139 110	0.05	0.06	0.01
EQT 0288 M-9	0.56	0.56	0.11
FUG 0001 F-6V	0.11		0.46
FUG 0004 F-6C	0.26		1.12
FUG 0005 F-6D	0.13		0.59
GRP 0014 WWT	4.01		17.55
GRP 0022 Fire Pump Diesel Engine	0.93	0.93	0.05

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120002
Permit Number: 2184-V3
Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0009 101	Methanol	0.001		<0.01
	Methyl isobutyl ketone	0.04		0.16
EQT 0021 104	Methyl isobutyl ketone	0.03	0.03	0.12
EQT 0028 105	Methanol	0.001	0.001	<0.01
	Methyl isobutyl ketone	0.08	0.12	0.35
EQT 0031 106	Methyl isobutyl ketone	0.21	0.82	0.90
EQT 0040 107	Methyl isobutyl ketone	<0.001	0.10	0.01
EQT 0045 108	Methanol	0.002	0.002	0.01
EQT 0052 201	Pyrocatechol	0.01		0.03
EQT 0056 202	Hydroquinone	0.001	0.05	<0.01
	Methanol	0.001	0.005	<0.01
	Pyrocatechol	0.01	0.05	0.02
EQT 0076 301	Hydroquinone	<0.001	0.01	<0.01
	Phenol	0.01	1.00	0.05
	Pyrocatechol	0.002	0.10	0.01
EQT 0082 302	Phenol	<0.001	0.01	<0.01
EQT 0089 303	Phenol	<0.001	0.01	<0.01
EQT 0094 304	Pyrocatechol	0.01	0.30	0.06
EQT 0097 306	Hydroquinone	0.01	0.02	0.04
EQT 0115 316	Hydroquinone	<0.001	0.004	<0.01
EQT 0126 M-6	Methyl isobutyl ketone	<0.001		<0.01
	Phenol	<0.001		<0.01
FUG 0001 F-6V	Methanol	0.04		0.18
	Methyl isobutyl ketone	0.06		0.28
FUG 0004 F-6C	Hydroquinone	0.003		0.01
	Phenol	0.06		0.28
	Pyrocatechol	0.003		0.01
FUG 0005 F-6D	Chloroethane	0.03		0.12
	Hydroquinone	0.001		0.01
	Methyl chloride	0.05		0.23
	Pyrocatechol	0.01		0.03
GRP 0014 WWT	Methanol	0.72		3.16
	Methyl isobutyl ketone	1.74		7.63

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
GRP 0014 WWT	Phenol	0.01		0.03
	Pyrocatechol	0.01		0.05
UNF 0001	Chloroethane			0.12
	Hydroquinone			0.09
	Methanol			3.38
	Methyl chloride			0.23
	Methyl isobutyl ketone			9.46
	Phenol			0.39
	Pyrocatechol			0.21

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0009 101 - LIGHTS TANK FARM SCRUBBER C-165

- 1 [LAC 33:III.2115.K.4] Maintain records to demonstrate that the waste gas stream from methanol unloading (line purge) is less than 100 lbs/24-hour period. [LAC 33:III.2115.K.4, LAC 33:III.2115.H.1.c]
- 2 [LAC 33:III.501.C.6] Flow rate ≥ 2.0 gallons/min. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 3 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
- 4 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 5 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all organic contents and washed or (2) emit only breathing losses which have been included in the permit emissions limits (limited to 10 days per year). STATE ONLY.
- 6 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 7 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

EQT 0010 D-148 - VANILLIN SOLVENT 1 TANK (MIBK STORAGE) D-148

- 8 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 9 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0011 D-149 - ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)

- 10 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 11 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0012 D-152 - SOLVENT 2 TANK (MIBK STORAGE) D-152

- 12 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 13 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0013 D-153 - SOLVENT 2 TANK (MIBK STORAGE) D-153

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0013 D-153 - SOLVENT 2 TANK (MIBK STORAGE) D-153

- 14 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
15 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0014 D-169 - SOLVENT 3 TANK (METHANOL STORAGE) D-169

- 16 [LAC 33:III.2103.A] Equip with submerged fill pipe.
17 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0015 102 - HEAVIES TANK FARM SCRUBBER C-187

- 18 [LAC 33:III.501.C.6] Flow rate \geq 3.6 gallons/min. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
19 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
20 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
Which Months: All Year Statistical Basis: None specified
21 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
22 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.
23 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

EQT 0016 D-107 (Vanessa) - GUAIACOL STORAGE TANK D-107

- 24 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
25 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0017 D-111 (Vanessa) - GUETOL STORAGE TANK D-111

- 26 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
27 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0018 D-113 (Vanessa) - GLYOXYLIC ACID STORAGE TANK D-113

- 28 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 29 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0019 103 - CONDENSATION SCRUBBER C-201

- 30 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
- 31 [LAC 33:III.501.C.6] Flow rate ≥ 2.1 gallons/min. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 32 [LAC 33:III.501.C.6] Submit annual report to LDEQ by March 31st of each year listing hours that the scrubber operated out of range. STATE ONLY.
- 33 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.
- 34 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
- 35 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
Which Months: All Year Statistical Basis: None specified

EQT 0020 C-216 - GUAIACOL RECYCLE TANK C-216

- 36 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 37 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 38 [LAC 33:III.501.C.6] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this tank. MACT is not required. STATE ONLY.

EQT 0021 104 - SOLVENT 1 VENT SCRUBBER C-248

- 39 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
- 40 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
- 41 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0021 104 - SOLVENT 1 VENT SCRUBBER C-248

- 42 [LAC 33:III.501.C.6] Flow rate \geq 1.95 gallons/min. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 43 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 44 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 45 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

EQT 0022 C-236 - NEUTRALIZATION SURGE TANK C-236

- 46 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 47 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0023 C-240 - EXTRACTOR TAILS UPSET TANK C-240

- 48 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 49 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0024 C-243 - EXTRACTOR 1 TAILS SAFETY DECANter C-243

- 50 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0025 C-244 - MANDELATE SURGE TANK C-244

- 51 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 52 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0026 C-249 - SOLVENT 1 SURGE TANK C-249

- 53 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0026 C-249 - SOLVENT 1 SURGE TANK C-249

- 54 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0027 C-247 - SOLVENT 1 WASHING SAFETY DECANter C-247

- 55 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0028 105 - OXIDATION SCRUBBER C-419

- 56 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
- 57 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 58 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 59 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.
- 60 [LAC 33:III.501.C.6] Flow rate ≥ 18.0 gallons/min. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 61 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
- 62 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

EQT 0029 C-409 - MANDELATE SURGE TANK C-409

- 63 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 64 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0030 C-417 - OXIDATION SURGE TANK D-417

- 65 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0030 C-417 - OXIDATION SURGE TANK D-417

- 66 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0031 106 - VANILLIN EXTRACTION SCRUBBER C-427

- 67 [LAC 33:III.2103.I.3] Record date and reason for any maintenance and repair of the applicable control devices and the estimated quantity and duration of VOC emissions during such activities.
- 68 [LAC 33:III.2103.I.7] Keep records of planned routine maintenance performed on the vapor loss control system, including the duration of each time the vapor loss control system does not meet the 95% VOC control requirement due to the planned routine maintenance. Record starting date/time and ending date/time of the maintenance period in which 95% control is not met.
- 69 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature ≥ 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (condenser/scrubber in series) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
- 70 [LAC 33:III.2115.J.1] Which Months: All Year Statistical Basis: None specified
Demonstrate compliance with LAC 33:III.2115 as requested by DEQ.
- 71 [LAC 33:III.2115.J.2] Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC 33:III.2115.J.2.a through e.
- 72 [LAC 33:III.2115.J] Comply with LAC 33:III.2115 as soon as practicable but in no event later than August 20, 2003. Comply with the requirements of LAC 33:III.2115 as soon as practicable, but in no event later than one year from the promulgation of the regulation revision, if subject to LAC 33:III.2115 as a result of a revision of LAC 33:III.2115.
- 73 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain the records specified in LAC 33:III.2115.K.1 through K.3. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
- 74 [LAC 33:III.501.C.6] Temperature ≤ 42 F. Temperature of scrubber water feed shall be maintained, except when oxidation/neutralization section is shutdown.
- 75 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: Daily average
Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed.
- 76 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.
- 77 [LAC 33:III.501.C.6] Flow rate ≥ 2.4 gallons/min.
Which Months: All Year Statistical Basis: Daily average
- 78 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency based on the DCS.
Which Months: All Year Statistical Basis: None specified
- 79 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0032 C-421 - SOLVENT 2 SURGE TANK C-421

- 80 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 81 [LAC 33:III.2103.E.1] VOC, Total \geq 95 % control efficiency using a vapor loss control system (condenser/scrubber). This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: None specified

EQT 0033 C-430 - SOLVENT 2 DECANter C-430

- 82 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature \geq 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (condenser/scrubber) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
Which Months: All Year Statistical Basis: None specified
- 83 [LAC 33:III.2115.J.1] Demonstrate compliance with LAC 33:III.2115 as requested by DEQ.
- 84 [LAC 33:III.2115.J.2] Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC 33:III.2115.J.2.a through e.
- 85 [LAC 33:III.2115.K.4] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Exempt from LAC 33:III.2115 when oxidation reaction section is shutdown. Maintain the records specified in LAC 33:III.2115.K.4. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0034 C-432 - EXTRACTION 2 DRAIN TANK C-432

- 86 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 87 [LAC 33:III.2103.E.1] VOC, Total \geq 95 % control efficiency using a vapor loss control system (condenser/scrubber). This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: None specified

EQT 0035 C-434 - EXTRACTION 2 TAILS SAFETY DECANter C-434

- 88 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0036 C-441 - AQUEOUS PHASE SURGE TANK C-441

- 89 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 90 [LAC 33:III.2103.E.1] VOC, Total \geq 95 % control efficiency using a vapor loss control system (condenser/scrubber). This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: None specified

EQT 0037 C-501 - SOLVENT 2 DISTILLATION SURGE TANK C-501

- 91 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 92 [LAC 33:III.2103.E.1] VOC, Total \geq 95 % control efficiency using a vapor loss control system (condenser/scrubber). This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: None specified

EQT 0038 C-558 - AQUEOUS EFFLUENTS TANK C-558

- 93 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 94 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0039 C-575 - SOLVENT 2 RECOVERY DECANter C-575

- 95 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0040 107 - DISTILLATION SCRUBBER C-557

- 96 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
- 97 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
- 98 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 99 [LAC 33:III.501.C.6] Flow rate \geq 1.0 gallons/min. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0040 107 - DISTILLATION SCRUBBER C-557

- 100 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency, i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 101 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.
- 102 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

EQT 0041 C-535 - TARS SURGE TANK C-535

- 103 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 104 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0042 C-616 - FLAKER SURGE TANK C-616

- 105 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 106 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0043 C-648 - RECYCLE PRODUCT HOPPER MELTER C-648

- 107 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0044 C-655 - MELTER SURGE TANK C-655

- 108 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 109 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0045 108 - CRYSTALLIZATION SCRUBBER C-624

- 110 [LAC 33:III.2103.E.1] VOC, Total \geq 95 % control efficiency. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0045 108 - CRYSTALLIZATION SCRUBBER C-624

- 111 [LAC 33:III.2103.I.3] Record date and reason for any maintenance and repair of the applicable control devices and the estimated quantity and duration of VOC emissions during such activities.
- 112 [LAC 33:III.2103.I.7] Keep records of planned routine maintenance performed on the vapor loss control system, including the duration of each time the vapor loss control system does not meet the 95% VOC control requirement due to the planned routine maintenance. Record starting date/time and ending date/time of the maintenance period in which 95% control is not met.
- 113 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
- 114 [LAC 33:III.501.C.6] Flow rate ≥ 2.1 gallons/min.
Which Months: All Year Statistical Basis: Four-hour average
- 115 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.
- 116 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed.
- 117 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS).
Which Months: All Year Statistical Basis: None specified
- 118 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

EQT 0046 C-541 - METHANOL WASHING DRUM C-541 (Vents through C-801)

- 119 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0047 C-801 - SOLVENT 3 RECOVERY FEED TANK C-801

- 120 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 121 [LAC 33:III.2103.E.1] VOC, Total ≥ 95 % control efficiency using a vapor loss control system (scrubber). This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: None specified

EQT 0048 C-603 - DISOLVER C-603

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0048 C-603 - DISOLVER C-603

- 122 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0049 C-606 - VACUUM CRYSTALLIZER C-606

- 123 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0050 C-617 - CENTRIFUGE SURGE TANK C-617

- 124 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 125 [LAC 33:III.2103.E.1] VOC, Total \geq 95 % control efficiency using a vapor loss control system (scrubber). This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: None specified

EQT 0051 109 - BAGHOUSE FILTER/SCRUBBER C-704

- 126 [LAC 33:III.1305] Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7.
- 127 [LAC 33:III.1311.B] Particulate matter (10 microns or less) (PM10): Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III.Chapter 13. STATE ONLY.
- 128 [LAC 33:III.501.C.6] Flow rate \geq 175.0 gallons/min with excess NaOH. STATE ONLY.
Which Months: All Year Statistical Basis: Four-hour average
- 129 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy once every four hours based on the DCS. STATE ONLY.
- 130 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 131 [LAC 33:III.501.C.6] Scrubber must operate at all times that the baghouse blower is operational.
- 132 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
Which Months: All Year Statistical Basis: None specified

EQT 0052 201 - TANK FARM SCRUBBER C-146

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0052 201 - TANK FARM SCRUBBER C-146

- 133 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 134 [LAC 33:III.501.C.6] Flow rate \geq 1.4 gallons/min. STATE ONLY.
- 135 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: Four-hour average
- 136 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.
- 137 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
- 138 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified
- Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
- Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber for which permitted site-wide emissions are greater than MER. MACT is not required.

EQT 0053 D-111 (Daphne) - PYROCATECHOL STORAGE TANK

- 139 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 140 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0054 D-128 - TARS STORAGE TANK D-128

- 141 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 142 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0055 D-141 - VERATROLE STORAGE TANK D-141

- 143 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 144 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0056 202 - VENT SCRUBBER C-685

- 145 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0056 202 - VENT SCRUBBER C-685

- 146 [LAC 33:III.2147] LAC 33:III.Chapter 21, Subchapter J - Limiting VOC Emissions from Reactor Processes and Distillation Operations in the SOCMI. Daphne is subject to LAC 33:III.2147 only if/when producing anisole. Daphne does not currently produce anisole. Before beginning anisole production, Rhodia will determine the applicability of all vents. For all subject vents, Rhodia will come into compliance with LAC 33:III.2147 prior to the startup of anisole campaign.
- 147 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
- 148 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
- 149 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified
Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 150 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.
- 151 [LAC 33:III.501.C.6] Flow rate ≥ 7.0 gallons/min. STATE ONLY.
- 152 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: Four-hour average
Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs for which site-wide emissions are greater than the MER are emitted from this scrubber. MACT is not required.

EQT 0057 C-201 - PC DISSOLUTION TANK C-201

- 153 [LAC 33:III.2149.C.1] VOC, Total ≥ 90 % reduction based on mass emission rate from individual process vent streams in aggregate within a batch process. For the pool of non-exempt batch process vents (C-251, C-301, C-201, and C-603), per LAC 33:III.2149.C.2.a, overall 90% control is achieved by controlling only C-251 and C-301 with greater than 99% efficiency. Use the RACT equation specified in LAC 33:III.2149.C.1 as applicable.
[LAC 33:III.2149.C.1, LAC 33:III.2149.C.2.f]
- 154 [LAC 33:III.2149.G.1.b] Which Months: All Year Statistical Basis: None specified
Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

EQT 0058 C-553 - GUAIACOL DISTILLATION FEED TANK C-553

- 155 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 156 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0059 C-561 - RECYCLE PROCESS WATER TANK C-561

- 157 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0059 C-561 - RECYCLE PROCESS WATER TANK C-561

- 158 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0060 C-603 - GUAIACOL DISTILLATION KETTLE C-603

- 159 [LAC 33:III.2149.C.1] VOC, Total $\geq 90\%$ reduction based on mass emission rate from individual process vent streams in aggregate within a batch process. For the pool of non-exempt batch process vents (C-251, C-301, C-201, and C-603), per LAC 33:III.2149.C.2.a, overall 90% control is achieved by controlling only C-251 and C-301 with greater than 99% efficiency. Use the RACT equation specified in LAC 33:III.2149.C.1 as applicable. [LAC 33:III.2149.C.1, LAC 33:III.2149.C.2.f]
Which Months: All Year Statistical Basis: None specified
- 160 [LAC 33:III.2149.G.1.b] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

EQT 0061 C-615 - TARS RECEIVER C-615

- 161 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 162 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0062 C-645 - PMDB RECEIVER C-645

- 163 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 164 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0063 C-651 - PC RECEIVER C-651

- 165 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 166 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0064 C-655 - GUAIACOL LT. ENDS RECEIVER C-655

- 167 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 168 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120002
Permit Number: 2184-V3
Air - Title V Regular Permit Minor Mod

EQT 0065 C-660 - INTERS./VERATROLE RECEIVER C-660

- 169 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
170 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0066 C-665 - SECOND RECEIVER C-665

- 171 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
172 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0067 C-670 - END OF CAMPAIGN RECEIVER C-670

- 173 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
174 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0068 C-675 - GUAIACOL RECEIVER C-675

- 175 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
176 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0069 C-701 - CRUDE VERATROLE WASH TANK C-701

- 177 [LAC 33:III.2149.G.1.b] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

EQT 0070 C-705 - WATER GUAIACOLATE RECEIVER C-705

- 178 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
179 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0071 C-710 - CAUSTIC WASH RECEIVER C-710

- 180 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
181 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0072 C-751 - VERATROLE DISTILLATION KETTLE C-751

- 182 [LAC 33:III.2149.G.1.b] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

EQT 0073 C-765 - LT. ENDS RECEIVER C-765

- 183 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
184 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0074 C-770 - DISTILLED VERATROLE RECEIVER C-770

- 185 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
186 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0075 203 - BAGHOUSE FOR HQ HANDLING

- 187 [LAC 33:III.1305] Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7.
188 [LAC 33:III.1311.B] Particulate matter (10 microns or less) (PM10): Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III.Chapter 13. STATE ONLY.
189 [LAC 33:III.501.C.6] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this baghouse. Determined to be MACT. STATE ONLY.

EQT 0076 301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)

- 190 [LAC 33:III.501.C.6] For up to 100 hours per year, if/when scrubber becomes plugged during normal operation, scrubber water temperature will be increased to remove pluggage and restore proper operation. STATE ONLY.
191 [LAC 33:III.501.C.6] Flow rate ≥ 0.46 gallons/min. STATE ONLY.
192 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: Four-hour average
193 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
194 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all organic contents and washed or (2) have minimal (e.g., breathing loss) emissions which have been included in the permit emissions limits. Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0076 301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)

- 195 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency, i.e. four hour block average based on the plant's distribution control system (DCS), STATE ONLY.
Which Months: All Year Statistical Basis: None specified
- 196 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs for which site-wide emissions are greater than the MER are emitted from this scrubber. MACT is not required.

EQT 0077 C-223 - PHENOL DRAIN TANK REACTION SURGE DRUM C-223

- 197 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0078 C-416 - PREDEPHENOL REFLUX DRUM C-416

- 198 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0079 C-508 - VERTICAL TAR DILUTER C-508

- 199 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0080 C-530 - DISTILLATION DRAN TANK C-530

- 200 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0081 C-532 - TAILS SURGE DRUM C-532

- 201 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0082 302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0082 302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)

- 202 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature ≥ 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (scrubber) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
- 203 [LAC 33:III.2115.J.1] Which Months: All Year Statistical Basis: None specified
- 204 [LAC 33:III.2115.J.2] Demonstrate compliance with LAC 33:III.2115 as requested by DEQ.
- 205 [LAC 33:III.2115.K] Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC 33:III.2115.J.2.a through e.
- 206 [LAC 33:III.501.C.6] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain the records specified in LAC 33:III.2115.K.1 through K.3. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
- 207 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all organic contents and washed or (2) emit only breathing losses which have been included in the permit emissions limits (limited to 10 days per year).
- 208 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency, i.e. four hour block average based on the plant's distribution control system (DCS).
- 209 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified
- 210 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on DCS.
- 211 [LAC 33:III.5109.A] For up to 100 hours per year, if/when scrubber becomes plugged during normal operation, scrubber water temperature will be increased to remove pluggage and restore proper operation.
- 212 [LAC 33:III.501.C.6] Flow rate ≥ 7.6 gallons/min.
- 213 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: Four-hour average
- 214 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs for which site-wide emissions are greater than the MER are emitted from this scrubber. MACT is not required.

EQT 0083 C-113 - PHENOL UNLOADING TANK C-113

- 212 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0084 D-107 - WASHWATER TANK D-107

- 213 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0084 D-107 - WASHWATER TANK D-107

- 214 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0085 D-111 - PHENOL MAKE-UP TANK D-111

- 215 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
216 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0086 D-115 - WASHWATER/GUAIACOL TANK D-115

- 217 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
218 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0087 D-315 - RAFFINATE TANK D-315

- 219 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature ≥ 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (scrubber) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent (Note: this requirement does not apply if the unit is shut down and D-315 emits only breathing losses [less than 100 lbs in 24 hours]).
Which Months: All Year Statistical Basis: None specified

EQT 0088 D-204 - RECYCLE PHENOL TANK D-204

- 220 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0089 303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)

- 221 [LAC 33:III.2147.E.4] Equipment/operational data recordkeeping by electronic or hard copy as needed Install, calibrate, maintain and operate monitoring device(s) on scrubber C-402 and/or condenser E-401 as approved by LDEQ Engineering to demonstrate compliance with TRE index limit specified under LAC 33:III.2147.C.2.
222 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all organic contents and washed or (2) have their vent line valve closed such that no emissions occur.
223 [LAC 33:III.501.C.6] Flow rate ≥ 4.0 gallons/min.
Which Months: All Year Statistical Basis: Four-hour average

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

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EQT 0089 303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)

- 224 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.
- 225 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency, i.e. four hour block average based on the plant's distribution control system (DCS).
- 226 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified
Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs for which site-wide emissions are greater than the MER are emitted from this scrubber. MACT is not required.

EQT 0090 C-320 - IPE STORAGE TANK C-320

- 227 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0091 C-308 - IPE SETTLER C-308

- 228 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0092 C-311 - WASHWATER DRUM C-311

- 229 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0093 C-322 - ETHER DRAIN TANK C-322

- 230 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0094 304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)

- 231 [LAC 33:III.501.C.6] For up to 100 hours per year, if/when scrubber becomes plugged during normal operation, scrubber water temperature will be increased to remove pluggage and restore proper operation. STATE ONLY.
- 232 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0094 304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)

- 233 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all organic contents and washed or (2) have minimal (e.g., breathing loss) emissions which have been included in the permit emissions limits. STATE ONLY.
- 234 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
- 235 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency, i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
- 236 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified
Flow rate ≥ 0.22 gallons/min. STATE ONLY.
- 237 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: Four-hour average
Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

EQT 0095 C-551 - PC RECEIVING DRUM C-551

- 238 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0096 C-563 - PC FLAKER FEED TANK C-563

- 239 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0097 306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)

- 240 [LAC 33:III.2115.K.4] Maintain records to demonstrate that each vent routed to the seal pot is less than 100 lbs/24-hour period. [LAC 33:III.2115.K.4, LAC 33:III.2115.H.1.c]

EQT 0098 C-650 - REFLUX SURGE DRUM C-650

- 241 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0099 D-607 - HQ DISSOLVER TANK D-607

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0099 D-607 - HQ DISSOLVER TANK D-607

242 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0100 D-610 - HQ SURGE TANK D-610

243 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0101 D-612 - CARBON TREATER TANK D-612

244 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0102 D-632 - CRYSTALLIZATION TANK D-632

245 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0103 D-652 - MOTHER LIQUOR SURGE TANK D-652

246 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0104 D-653 - CONC. COLUMN FEED TANK D-653

247 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0105 D-657 - MOTHER LIQUOR SURGE DRUM D-657

248 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120002
Permit Number: 2184-V3
Air - Title V Regular Permit Minor Mod

EQT 0106 307 - SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601

249 [LAC 33:III.1311.B] Particulate matter (10 microns or less) (PM10): Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III.Chapter 13. STATE ONLY.

EQT 0107 308 - OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)

250 [LAC 33:III.1311.B] Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.
251 [LAC 33:III.501.C.6] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this source. Determined to be MACT. STATE ONLY.

EQT 0109 310 - CARBON BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)

252 [LAC 33:III.1311.B] Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.

EQT 0110 311 - PC PACKAGING BAGHOUSE Y-731 (P&I.D. F703)

253 [LAC 33:III.1311.B] Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.

EQT 0111 312 - HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)

254 [LAC 33:III.1311.B] Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.
255 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this source. MACT is not required.

EQT 0112 313 - HQ REWORK DUMPER BAGHOUSE S-693 FOR D607 (P&I.D. F602)

256 [LAC 33:III.1311.B] Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.
257 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this source. MACT is not required.

EQT 0113 315A - FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)

258 [LAC 33:III.1101.B] Opacity \leq 20 percent, except that such emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc
Activity Number: PER20120002
Permit Number: 2184-V3
Air - Title V Regular Permit Minor Mod

EQT 0113 315A - FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)

259 [LAC 33:III.1313.C] Total suspended particulate \leq 0.6 lb/MMBTU of heat input.
Which Months: All Year Statistical Basis: None specified

EQT 0114 315B - PRIMARY FLUID HEATER F-971 (P&I.D. F925)

260 [LAC 33:III.1101.B] Opacity \leq 20 percent, except that such emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified
261 [LAC 33:III.1313.C] Total suspended particulate \leq 0.6 lb/MMBTU of heat input.
Which Months: All Year Statistical Basis: None specified

EQT 0116 317 - VACUUM CLEAN-UP PACKAGING BAGHOUSE Y-760X (P&I.D. F703)

262 [LAC 33:III.1311.B] Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.

EQT 0118 401A - WWT TANK NO. 28 (P&I.D. F101)

263 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
264 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
265 [LAC 33:III.2153.F.1] Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC 33:III.2153.F.1, LAC 33:III.2153.G]

EQT 0119 401B - STORMWATER TANK NO. 29 (P&I.D. F101)

266 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
267 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
268 [LAC 33:III.2153.F.1] Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC 33:III.2153.F.1, LAC 33:III.2153.G]

EQT 0120 401C - TANK D-197

269 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
270 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
271 [LAC 33:III.2153.F.1] Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC 33:III.2153.F.1, LAC 33:III.2153.G]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

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EQT 0121 402A - WEST AERATION BASIN D210

- 272 [LAC 33:III.2153.F.1] Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC 33:III.2153.F.1, LAC 33:III.2153.G]

EQT 0122 402B - EAST AERATION BASIN D213 (P&I.D. F201)

- 273 [LAC 33:III.2153.F.1] Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC 33:III.2153.F.1, LAC 33:III.2153.G]

EQT 0123 402C - WEST CLARIFIER D301 (P&I.D. F302)

- 274 [LAC 33:III.2153.F.1] Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC 33:III.2153.F.1, LAC 33:III.2153.G]

EQT 0124 402D - EAST CLARIFIER D304 (P&I.D. F302)

- 275 [LAC 33:III.2153.F.1] Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC 33:III.2153.F.1, LAC 33:III.2153.G]

EQT 0125 M-5 - CATHY (E925) AND VANESSA (E907) COOLING TOWERS (P&I.D. F903)

- 276 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No additional controls are required.

EQT 0127 C-101 - IPE SOLVENT STORAGE TANK C-101

- 277 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors (combustion). All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 278 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 279 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

EQT 0128 C-351 - RAG LAYER DIVERTING TANK C-351

- 280 [LAC 33:III.2149.G.1.b] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.
- 281 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0129 C-401 - AQUEOUS PHASE SURGE TANK C-401

- 282 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors (combustion). All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 283 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 284 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

EQT 0130 C-352 - RAG LAYER SURGE TANK C-352

- 285 [LAC 33:III.2103.A] Equip with submerged fill pipe.
- 286 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 287 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

EQT 0131 C-461 - AQUEOUS EFFLUENT TANK C-461

- 288 [LAC 33:III.2103.A] Equip with submerged fill pipe.
- 289 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 290 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

EQT 0132 C-521 - ORGANIC PHASE SURGE TANK C-521

- 291 [LAC 33:III.2103.A] Equip with submerged fill pipe.
- 292 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 293 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

EQT 0133 C-132 - MeCl STORAGE TANK C-132

- 294 [LAC 33:III.2103.A] Equip with submerged fill pipe.
- 295 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

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AI ID: 1314 - Rhodia Inc

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EQT 0133 C-132 - MeCl STORAGE TANK C-132

- 296 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

EQT 0134 C-136 - EtCl STORAGE TANK C-136

- 297 [LAC 33:III.2103.A] Equip with submerged fill pipe.
- 298 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 299 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

EQT 0135 C-301 - ACIDIFICATION/DECANTATION TANK C-301

- 300 [LAC 33:III.2149.C.1] VOC, Total \geq 90 % reduction based on mass emission rate from individual process vent streams in aggregate within a batch process. For the pool of non-exempt batch process vents (C-251, C-301, C-201, and C-603), per LAC 33:III.2149.C.2.a, overall 90% control is achieved by controlling only C-251 and C-301 with greater than 99% efficiency. Use the RACT equation specified in LAC 33:III.2149.C.1 as applicable. [LAC 33:III.2149.C.1, LAC 33:III.2149.C.2.f]
Which Months: All Year Statistical Basis: None specified
- 301 [LAC 33:III.2149.G.1.b] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.
- 302 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

EQT 0136 C-503 - DEETHERATION IPE DECANter C-503

- 303 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature \geq 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (combustion) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
Which Months: All Year Statistical Basis: None specified
- 304 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

EQT 0137 D-681 - SCREENER RESIDUE DISSOLVER D-681

- 305 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

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EQT 0139 110 - HIGH PURITY PC MIXING VESSEL

306 [LAC 33:III.2115.K.4] Maintain records to demonstrate that the criteria are being met for any exemption claimed.

EQT 0188 C-202 - Premixing Reactor

307 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0189 C-207 - Veratrole Stripper

308 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0190 C-217 - No. 1 Condensation Reactor

309 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0191 C-219 - No. 2 Condensation Reactor

310 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0192 C-221 - No. 3 Condensation Reactor

311 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0193 C-223 - No. 4 Condensation Reactor

312 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0194 C-225 - No. 5 Condensation Reactor

313 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0195 C-227 - Polishing Reactor

314 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0196 C-241 - Guaiacol Extraction Column

315 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0197 C-245 - Solvent 1 Washing Column

316 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0198 C-301 - Guaiacol Recovery Column

317 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0199 C-306 - Guaiacol/Tars Separator

318 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0200 C-312 - Solvent 1Stripper Decanter

319 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0201 C-314 - Solvent 1Stripper

- 320 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0202 C-316 - Solvent 1 Cold Trap

- 321 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0203 C-320 - Gualacol Distillation Reflux Drum

- 322 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0204 C-322X - Solvent 1 Vacuum Package Separator

- 323 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0205 H-317 - Vacuum System

- 324 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0206 C-407 - Oxidation Reactor

- 325 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0207 C-416 - Oxidation Column

- 326 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0208 C-429 - CO2 Separator

- 327 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature \geq 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (condenser/scrubber in series) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
Which Months: All Year Statistical Basis: None specified
- 328 [LAC 33:III.2115.J.1] Demonstrate compliance with LAC 33:III.2115 as requested by DEQ.
- 329 [LAC 33:III.2115.J.2] Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC 33:III.2115.J.2.a through e.
- 330 [LAC 33:III.2115.K.4] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Exempt from LAC 33:III.2115 when oxidation reaction section is shutdown. Maintain the records specified in LAC 33:III.2115.K.4. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0209 C-435 - Vanillin Extraction Column

- 331 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0210 C-440 - Solvent 2 Washing Column

- 332 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0211 C-504 - Vanillin/Solvent 2 Atm. Distillation Column

- 333 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0212 C-507 - Vanillin/Solvent 2 Vacuum Distillation Column

- 334 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0213 C-516 - Solvent 2 Cold Trap

- 335 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0214 C-533X - Solvent 2 Vacuum Package Separator

- 336 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0215 C-565 - Solvent 2 Recovery Column (Aqueous Phase Stripper)

- 337 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0216 C-568 - Solvent 2 Recovery Column (Top Rectification)

- 338 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0217 E-428 - Condenser

- 339 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature \geq 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (condenser/scrubber in series) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
- 340 [LAC 33:III.2115.J.1] Which Months: All Year Statistical Basis: None specified
- 341 [LAC 33:III.2115.J.2] Demonstrate compliance with LAC 33:III.2115 as requested by DEQ.
- 342 [LAC 33:III.2115.K.4] Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC 33:III.2115.J.2.a through e.
- Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Exempt from LAC 33:III.2115 when oxidation reaction section is shutdown. Maintain the records specified in LAC 33:III.2115.K.4. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0218 H-520 - Vacuum System

- 343 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0219 C-525 - Tars Removal Column

- 344 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0220 C-525 - Tars By-Pass Tank

- 345 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0221 C-545 - Lights Removal Column

- 346 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0222 C-555A/B - Vanillin Cold Traps

- 347 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0223 C-562X - Vanillin Purification Vacuum Package Separator

- 348 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0224 H-556 - Vacuum System

- 349 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0225 C-634X - Dryer Scrubber

350 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0226 C-637X - Crystallization Vacuum Package Separator

351 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0227 C-640 - Dryer

352 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0228 C-805 - Solvent 3 Recovery Column

353 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0229 H-619 - Vacuum System

354 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0230 Y-620 - Centrifuge A

355 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0231 Y-621 - Centrifuge B

356 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0232 Y-640 - Dryer

357 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0233 C-606 - Guaiacol Distillation Column

358 [LAC 33:III.2149.G.1.b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

EQT 0234 C-683X - Guaiacol Vacuum Package Separator

359 [LAC 33:III.2149.G.1.b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

EQT 0235 C-687A/B - Guaiacol Distillation Cold Traps

360 [LAC 33:III.2149.G.1.b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

EQT 0236 C-754 - Veratrole Distillation Column

361 [LAC 33:III.2149.G.1.b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

EQT 0237 C-783X - Veratrole Vacuum Separator

362 [LAC 33:III.2149.G.1.b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

EQT 0238 C-787 - Veratrole Distillation Cold Traps

363 [LAC 33:III.2149.G.1.b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

EQT 0239 C-213 - First Reactor

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0239 C-213 - First Reactor

- 364 [LAC 33:III.2147.C.2] Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. Calculate the TRE index at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5 TRE index value ≥ 1 (no units) without the use of volatile organic compound emission control device and with or without the use of one or more recovery devices. Calculate the TRE index value at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5.
- 365 [LAC 33:III.2147.D.7] Which Months: All Year Statistical Basis: None specified
Recalculate the flow rate, TOC concentration, and TRE index value within two weeks of any process change that could effect a change in one or more of these vent stream parameters. Use the methods and procedures of LAC 33:III.2147 for the recalculations.
- 366 [LAC 33:III.2147.F] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2147.F.1 through F.4, as applicable.

EQT 0246 E-418 - Phenol Condenser

- 367 [LAC 33:III.2147.C.2] Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. Calculate the TRE index at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5 TRE index value ≥ 1 (no units) without the use of volatile organic compound emission control device and with or without the use of one or more recovery devices. Calculate the TRE index value at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5.
- 368 [LAC 33:III.2147.D.7] Which Months: All Year Statistical Basis: None specified
Recalculate the flow rate, TOC concentration, and TRE index value within two weeks of any process change that could effect a change in one or more of these vent stream parameters. Use the methods and procedures of LAC 33:III.2147 for the recalculations.
- 369 [LAC 33:III.2147.F] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2147.F.1 through F.4, as applicable.

EQT 0247 H-524 - Vacuum System

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0247 H-524 - Vacuum System

- 370 [LAC 33:III.2147.C.2] Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. Calculate the TRE index at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5 TRE index value ≥ 1 (no units) without the use of volatile organic compound emission control device and with or without the use of one or more recovery devices. Calculate the TRE index value at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5.
- 371 [LAC 33:III.2147.D.7] Which Months: All Year Statistical Basis: None specified
Recalculate the flow rate, TOC concentration, and TRE index value within two weeks of any process change that could effect a change in one or more of these vent stream parameters. Use the methods and procedures of LAC 33:III.2147 for the recalculations.
- 372 [LAC 33:III.2147.F] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2147.F.1 through F.4, as applicable.

EQT 0251 E-401 - Solvent Vent Condenser

- 373 [LAC 33:III.2147.C.2] Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. Calculate the TRE index at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5 TRE index value ≥ 1 (no units) without the use of volatile organic compound emission control device and with or without the use of one or more recovery devices. Calculate the TRE index value at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5.
- 374 [LAC 33:III.2147.D.7] Which Months: All Year Statistical Basis: None specified
Recalculate the flow rate, TOC concentration, and TRE index value within two weeks of any process change that could effect a change in one or more of these vent stream parameters. Use the methods and procedures of LAC 33:III.2147 for the recalculations.
- 375 [LAC 33:III.2147.F] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2147.F.1 through F.4, as applicable.
- 376 [LAC 33:III.501.C.6] Condenser must operate at all times unless the unit is not in operation and the vessels normally vented to the condenser (1) have been emptied of all organic contents and washed or (2) have their vent line valve closed such that no emissions occur.
- 377 [LAC 33:III.501.C.6] The condenser is equipped with a high temperature alarm. The maximum temperature of the water supplied to the condenser shall be maintained at 13 degrees Celsius based on a four hour average.

EQT 0253 H-545 - Vacuum System

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0253 H-545 - Vacuum System

- 378 [LAC 33:III.2147.C.2] Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. Calculate the TRE index at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5 TRE index value ≥ 1 (no units) without the use of volatile organic compound emission control device and with or without the use of one or more recovery devices. Calculate the TRE index value at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5.
- 379 [LAC 33:III.2147.D.7] Which Months: All Year Statistical Basis: None specified
Recalculate the flow rate, TOC concentration, and TRE index value within two weeks of any process change that could effect a change in one or more of these vent stream parameters. Use the methods and procedures of LAC 33:III.2147 for the recalculations.
- 380 [LAC 33:III.2147.F] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2147.F.1 through F.4, as applicable.

EQT 0254 S-560 - PC Flaker

- 381 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0255 C-251 - Batch Reactor

- 382 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
- 383 [LAC 33:III.2149.C.1] VOC, Total ≥ 90 % reduction based on mass emission rate from individual process vent streams in aggregate within a batch process. For the pool of non-exempt batch process vents (C-251, C-301, C-201, and C-603), per LAC 33:III.2149.C.2.a, overall 90% control is achieved by controlling only C-251 and C-301 with greater than 99% efficiency. Use the RACT equation specified in LAC 33:III.2149.C.1 as applicable.
[LAC 33:III.2149.C.1, LAC 33:III.2149.C.2.f]
- 384 [LAC 33:III.2149.G.1.b] Which Months: All Year Statistical Basis: None specified
Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.
- 385 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

EQT 0256 H-640 - Vacuum System for Crystallizers

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0256 H-640 - Vacuum System for Crystallizers

- 386 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

EQT 0257 C-451 - Extraction Column

- 387 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature \geq 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (combustion) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
- 388 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified
Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

EQT 0258 C-501 - Detheration Column

- 389 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature \geq 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (combustion) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
- 390 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified
Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

EQT 0259 C-511 - Detheration Guaiacol Decanter

- 391 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature \geq 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (combustion) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
- 392 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified
Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

EQT 0260 C-551 - Crude Guaiacol Dehydration Column

- 393 [LAC 33:III.2115.B] Nonhalogenated hydrocarbon burning: Temperature \geq 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (combustion) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
- Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0260 C-551 - Crude Guaiacol Dehydration Column

394 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

EQT 0261 C-555 - Wet Guaiacol Tank

395 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3 a-e.
396 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
397 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

EQT 0288 M-9 - Emergency Diesel Generator for Daphne/Vanessa Sump

398 [40 CFR 63.6595(a)(1)] 40 CFR 63 Subpart ZZZZ requirements become effective May 3, 2013. [40 CFR 63.6595(a)(1)]
399 [40 CFR 63.6603(a)] Equipment/operational data monitored by visual inspection/determination annually or every 500 hours of operation, whichever comes first. Inspect all hoses and belts, and replace as necessary. Subpart ZZZZ. [40 CFR 63.6603(a)]
Which Months: All Year Statistical Basis: None specified
400 [40 CFR 63.6603(a)] Equipment/operational data monitored by visual inspection/determination annually or every 1,000 hours of operation, whichever comes first. Inspect air cleaner. Subpart ZZZZ. [40 CFR 63.6603(a)]
Which Months: All Year Statistical Basis: None specified
401 [40 CFR 63.6603(a)] Change oil and filter every 500 hours of operation or annually, whichever comes first. Subpart ZZZZ. [40 CFR 63.6603(a)]
402 [40 CFR 63.6603(a)] Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. Subpart ZZZZ. [40 CFR 63.6603(a), 40 CFR 63.6625(h)]
403 [40 CFR 63.6605(a)] Be in compliance with emission limitations and operating limitations in 40 CFR 63 Subpart ZZZZ at all times. Subpart ZZZZ. [40 CFR 63.6605(a)]
404 [40 CFR 63.6605(b)] Operate and maintain at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6605(b)]
405 [40 CFR 63.6625(e)] Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6625(e)]
406 [40 CFR 63.6625(f)] Install a non-resettable hour meter. Subpart ZZZZ. [40 CFR 63.6625(f)]
407 [40 CFR 63.6640(a)] Demonstrate continuous compliance with each applicable emission limitation and operating limitation in 40 CFR 63 Subpart ZZZZ Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d according to methods specified in 40 CFR 63 Subpart ZZZZ Table 6. Subpart ZZZZ. [40 CFR 63.6640(a)]
408 [40 CFR 63.6640(f)(1)ii] Operate for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Limit maintenance checks and readiness testing to 100 hours per year. Subpart ZZZZ. [40 CFR 63.6640(f)(1)ii]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0288 M-9 - Emergency Diesel Generator for Daphne/Vanessa Sump

- 409 [40 CFR 63.6640(f)(1)iii] Operate up to 50 hours per year in non-emergency situations, but count those 50 hours towards the 100 hours per year provided for maintenance and testing. Do not use the 50 hours per year for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that the emergency engine may be operated for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. Do not operate for more than 30 minutes prior to the time when the emergency condition is expected to occur, and terminate the engine operation immediately after the facility is notified that the emergency condition is no longer imminent. Count the 15 hours per year of demand response operation as part of the 50 hours of operation per year provided for non-emergency situations. Subpart ZZZZ. [40 CFR 63.6640(f)(1)iii]
- 410 [40 CFR 63.6655] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.6655(a) through (f), as applicable. Subpart ZZZZ.
- 411 [LAC 33:III.1101.B] Opacity \leq 20 percent, except that such emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified
- 412 [LAC 33:III.1311.C] Opacity \leq 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: Six-minute average

EQT 0289 E-318 - Predephenoling Vent Condenser

- 413 [LAC 33:III.501.C.6] Condenser must operate at all times unless the unit is not in operation and the vessels normally vented to the condenser (1) have been emptied of all organic contents and washed or (2) emit only breathing losses which have been included in the permit emissions limits (limited to 10 days per year if downstream scrubber is also off).
- 414 [LAC 33:III.501.C.6] The condenser is equipped with a high temperature alarm. The maximum temperature of the water supplied to the condenser shall be maintained at 13 degrees Celsius based on a four hour average.

FUG 0001 F-6V - VANESSA FUGITIVE EMISSIONS

- 415 [LAC 33:III.2111] Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment.
- 416 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this source. MACT is not required.

FUG 0004 F-6C - CATHY FUGITIVE EMISSIONS

- 417 [LAC 33:III.2111] Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

FUG 0004 F-6C - CATHY FUGITIVE EMISSIONS

- 418 [LAC 33:III.2122.C.1.c] Repair according to LAC 33:III.2122.C.3 any regulated component observed leaking by sight, sound, or smell, regardless of the leak's concentration, except those covered under LAC 33:III.2122.C.1.d.
- 419 [LAC 33:III.2122.C.1.d] Pumps and valves in heavy liquid service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 within 5 days if observed leaking by sight, sound, or smell. Repair according to LAC 33:III.2122.C.3 if the pump or valve is determined to be leaking in excess of the applicable limits given in LAC 33:III.2122.
- 420 [LAC 33:III.2122.C.2] Which Months: All Year Statistical Basis: None specified
Do not locate any valve, except safety pressure relief valves, at the end of a pipe or line containing volatile organic compounds unless the end of such line is sealed with a second valve, a blind flange, a plug, or a cap. Remove such sealing devices only when the line is in use, for example, when a sample is being taken. When the line has been used and is subsequently resealed, close the upstream valve first, followed by the sealing device.
- 421 [LAC 33:III.2122.C.3] Make every reasonable effort to repair a leaking component, as described in LAC 33:III.2122, within 15 days, except as provided.
- 422 [LAC 33:III.2122.C.4] Determine the percent of leaking components at a process unit for a test period using the equation in LAC 33:III.2122.C.4.
- 423 [LAC 33:III.2122.C.5] Determine the total percent of leaking and unrepairable components using the equation in LAC 33:III.2122.C.5.
- 424 [LAC 33:III.2122.D.1.a] Process drains: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 annually (one time per year). If a reading of 1,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3.
Which Months: All Year Statistical Basis: None specified
- 425 [LAC 33:III.2122.D.1.b.i] Compressor seals: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 5,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3.
Which Months: All Year Statistical Basis: None specified
- 426 [LAC 33:III.2122.D.1.b.ii] Pressure relief valves in gas service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 1,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3.
Which Months: All Year Statistical Basis: None specified
- 427 [LAC 33:III.2122.D.1.b.iii] Valves in light liquid service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 1,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3. Permittee may elect to comply with the alternate standards for valves in LAC 33:III.2122.E (skip period provisions).
Which Months: All Year Statistical Basis: None specified
- 428 [LAC 33:III.2122.D.1.b.iv] Pumps in light liquid service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 5,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3.
Which Months: All Year Statistical Basis: None specified
- 429 [LAC 33:III.2122.D.1.b.v] Valves in gas service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 1,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3. Permittee may elect to comply with the alternate standards for valves in LAC 33:III.2122.E (skip period provisions).
Which Months: All Year Statistical Basis: None specified
- 430 [LAC 33:III.2122.D.1.c] Pumps: Seal or closure mechanism monitored by visual inspection/determination weekly (52 times a year).
Which Months: All Year Statistical Basis: None specified
- 431 [LAC 33:III.2122.D.1.d.i] Flanged connectors: Presence of a leak monitored by visual, audible, and/or olfactory weekly.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

FUG 0004 F-6C - CATHY FUGITIVE EMISSIONS

- 432 [LAC 33:III.2122.D.1.e] Instrumentation systems: Presence of a leak monitored by visual, audible, and/or olfactory weekly.
Which Months: All Year Statistical Basis: None specified
- 433 [LAC 33:III.2122.D.3.a] Pressure relief valves: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 within 24 hours after venting to the atmosphere. If a reading of 1,000 ppmv or greater (for petroleum refineries, SOCM, MTBE, and polymer manufacturing industry) or 2,500 ppmv or greater (for natural gas processing plants) is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3.
Which Months: All Year Statistical Basis: None specified
- 434 [LAC 33:III.2122.D.3.b] All components: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 upon each occurrence of a leak detected by sight, smell, or sound, unless electing to implement actions as specified in LAC 33:III.2122.C.3.
Which Months: All Year Statistical Basis: None specified
- 435 [LAC 33:III.2122.D.3.c] Inaccessible valves: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 annually (at a minimum).
Which Months: All Year Statistical Basis: None specified
- 436 [LAC 33:III.2122.D.3.d] Unsafe-to-monitor valves: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 upon each occurrence of conditions allowing these valves to be monitored safely.
Which Months: All Year Statistical Basis: None specified
- 437 [LAC 33:III.2122.F.1] When a component which has a leak that cannot be repaired, as described in LAC 33:III.2122.C, is located, affix to the leaking component a weatherproof and readily visible tag bearing an identification number and the date the leak is located. Remove the tag after the leak has been repaired.
- 438 [LAC 33:III.2122.F] Equipment/operational data recordkeeping by survey log upon each occurrence of a leak. Include the leaking component information specified in LAC 33:III.2122.F.2.a through j. Retain the survey log for two years after the latter date specified in LAC 33:III.2122.F.2 and make said log available to DEQ upon request.
- 439 [LAC 33:III.2122.G] Submit report: Due semiannually, by the 31st of January and July, to the Office of Environmental Assessment, Environmental Technology Division. Include the information specified in LAC 33:III.2122.G.1 through 6 for each calendar quarter during the reporting period.

FUG 0005 F-6D - DAPHNE FUGITIVE EMISSIONS

- 440 [LAC 33:III.2111] Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment.
- 441 [LAC 33:III.2122] LAC 33:III.2122 applies only if/when anisole is produced. Rhodia will implement a fugitive monitoring program per LAC 33:III.2122 prior to startup of anisole campaign.

GRP 0006 - Cathy

Group Members: EQT 0100EQT 0101EQT 0102EQT 0103EQT 0104EQT 0105EQT 0106EQT 0107EQT 0109EQT 0110EQT 0111EQT 0112EQT 0113EQT 0114EQT 0115EQT 0116EQT 0137EQT 0139EQT 0239EQT 0240EQT 0241EQT 0242EQT 0243EQT 0244EQT 0245EQT 0246EQT 0247EQT 0248EQT 0249EQT 0250EQT 0251EQT 0252EQT 0253EQT 0254EQT 0256EQT 0004EQT 0080EQT 0081EQT 0083EQT 0084EQT 0085EQT 0086EQT 0087EQT 0088EQT 0090EQT 0091EQT 0092EQT 0093EQT 0095EQT 0096EQT 0098EQT 0099EQT 0076EQT 0077EQT 0078EQT 0079

- 442 [LAC 33:III.2147.F] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2147.F.1 through F.4, as applicable.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

GRP 0014 WWT - EMISSIONS CAP - WW TREATMENT PLANT

Group Members: EQT 0118EQT 0119EQT 0120EQT 0121EQT 0122EQT 0123EQT 0124

- 443 [LAC 33:III.2153.F.1] Maintain records to demonstrate that the annual VOC loading in wastewater is less than or equal to 10 Mg (11.03 tons).

GRP 0022 Fire Pump Diesel Engines - Fire Pump Diesel Engines

Group Members: EQT 0286EQT 0287

- 444 [40 CFR 63.6595(a)(1)] 40 CFR 63 Subpart ZZZZ requirements become effective May 3, 2013. [40 CFR 63.6595(a)(1)]
- 445 [40 CFR 63.6603(a)] Equipment/operational data monitored by visual inspection/determination annually or every 500 hours of operation, whichever comes first. Inspect all hoses and belts, and replace as necessary. Subpart ZZZZ. [40 CFR 63.6603(a)]
Which Months: All Year Statistical Basis: None specified
- 446 [40 CFR 63.6603(a)] Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. Subpart ZZZZ. [40 CFR 63.6603(a), 40 CFR 63.6625(h)]
- 447 [40 CFR 63.6603(a)] Equipment/operational data monitored by visual inspection/determination annually or every 1,000 hours of operation, whichever comes first. Inspect air cleaner. Subpart ZZZZ. [40 CFR 63.6603(a)]
Which Months: All Year Statistical Basis: None specified
- 448 [40 CFR 63.6603(a)] Change oil and filter every 500 hours of operation or annually, whichever comes first. Subpart ZZZZ. [40 CFR 63.6603(a)]
- 449 [40 CFR 63.6605(a)] Be in compliance with emission limitations and operating limitations in 40 CFR 63 Subpart ZZZZ at all times. Subpart ZZZZ. [40 CFR 63.6605(a)]
- 450 [40 CFR 63.6605(b)] Operate and maintain at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6605(b)]
- 451 [40 CFR 63.6625(e)] Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6625(e)]
- 452 [40 CFR 63.6625(f)] Install a non-resettable hour meter. Subpart ZZZZ. [40 CFR 63.6625(f)]
- 453 [40 CFR 63.6640(a)] Demonstrate continuous compliance with each applicable emission limitation and operating limitation in 40 CFR 63 Subpart ZZZZ Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d according to methods specified in 40 CFR 63 Subpart ZZZZ Table 6. Subpart ZZZZ. [40 CFR 63.6640(a)]
- 454 [40 CFR 63.6640(f)(1)ii] Operate for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Limit maintenance checks and readiness testing to 100 hours per year. Subpart ZZZZ. [40 CFR 63.6640(f)(1)ii]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

GRP 0022 Fire Pump Diesel Engines - Fire Pump Diesel Engines

- 455 [40 CFR 63.6640(f)(1)iii] Operate up to 50 hours per year in non-emergency situations, but count those 50 hours towards the 100 hours per year provided for maintenance and testing. Do not use the 50 hours per year for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that the emergency engine may be operated for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. Do not operate for more than 30 minutes prior to the time when the emergency condition is expected to occur, and terminate the engine operation immediately after the facility is notified that the emergency condition is no longer imminent. Count the 15 hours per year of demand response operation as part of the 50 hours of operation per year provided for non-emergency situations. Subpart ZZZZ. [40 CFR 63.6640(f)(1)iii]
- 456 [40 CFR 63.6655] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.6655(a) through (f), as applicable. Subpart ZZZZ.
- 457 [LAC 33:III.1101.B] Opacity <= 20 percent, except that such emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified
- 458 [LAC 33:III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: Six-minute average

UNF 0001 - Cathyal Plant

- 459 [40 CFR 60.] All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.
- 460 [40 CFR 61.145(b)(1)] Provide DEQ with written notice of intention to demolish or renovate prior to performing activities to which 40 CFR 61 Subpart M applies. Delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery is acceptable. [40 CFR 61.145(b)(1)]
- 461 [40 CFR 61.148] Do not install or reinstall on a facility component any insulating materials that contain commercial asbestos if the materials are either molded and friable or wet-applied and friable after drying. Subpart M.
- 462 [40 CFR 63.] All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A as delineated in Table 8 of 40 CFR 63 Subpart ZZZZ.
- 463 [40 CFR 68.150] Submit Risk Management Plan (RMP): Due no later than June 21, 1999, or three years after the date on which a regulated substance is first listed under 68.130, or the date on which a regulated substance is first present above a threshold quantity in a process. Submit in a method and format to a central point as specified by EPA prior to June 21, 1999.
- 464 [40 CFR 68.155] Provide in the RMP an executive summary that includes a brief description of the elements listed in 68.155(a) through (f).
- 465 [40 CFR 68.160] Complete a single registration form and include in the RMP. Cover all regulated substances handled in covered processes. Include in the registration the information specified in 68.160(b)(1) through (20).
- 466 [40 CFR 68.165] Submit in the RMP information the release scenarios specified in 68.165(a)(2). Include the data listed in 68.165(b)(1) through (14).
- 467 [40 CFR 68.168] Submit in the RMP the information provided in 68.42(b) on each accident covered by 68.42(a).
- 468 [40 CFR 68.175] Provide in the RMP the information indicated in 68.175(b) through (p).

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

UNF 0001 - Cathyval Plant

- 469 [40 CFR 68.180] Provide in the RMP the emergency response information listed in 68.180(a) through (c).
- 470 [40 CFR 68.185(b)] Submit in the RMP a single certification that, to the best of the signer's knowledge, information, and belief formed after reasonable inquiry, the information submitted is true, accurate, and complete. [40 CFR 68.185(b)]
- 471 [40 CFR 68.190(c)] Submit revised registration to EPA: Due within six months after a stationary source is no longer subject to 40 CFR 68. Indicate that the stationary source is no longer covered. [40 CFR 68.190(c)]
- 472 [40 CFR 68.190] Review and update the RMP as specified in 68.190(b) and submit it in a method and format to a central point specified by EPA prior to June 21, 1999.
- 473 [40 CFR 68.200] Maintain records supporting the implementation of 40 CFR 68 for five years unless otherwise provided.
- 474 [40 CFR 68.22] Use the endpoints specified in 68.22(a) through (g) for analyses of offsite consequences.
- 475 [40 CFR 68.25] Analyze the release scenarios in 68.25, as specified in 68.25(a) through (h).
- 476 [40 CFR 68.28] Identify and analyze at least one alternative release scenario for each regulated toxic substance held in a covered process(es) and at least one alternative release scenario to represent all flammable substances held in covered processes, as specified in 68.28(b) through (e).
- 477 [40 CFR 68.30] Estimate in the RMP the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
- 478 [40 CFR 68.33] List in the RMP environmental receptors within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
- 479 [40 CFR 68.36(b)] Submit revised RMP: Due within six months after changes in processes, quantities stored or handled, or any other aspect of the stationary source increase or decrease the distance to the endpoint by a factor of two or more. [40 CFR 68.36(b)]
- 480 [40 CFR 68.36] Review and update the offsite consequence analyses at least once every five years. Complete a revised analysis within six months if changes in processes, quantities stored or handled, or any other aspect of the stationary source might reasonably be expected to increase or decrease the distance to the endpoint by a factor of two or more.
- 481 [40 CFR 68.39] Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain the records specified in 68.39(a) through (e) on the offsite consequence analyses.
- 482 [40 CFR 68.42] Include in the five-year accident history all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage. Include the information specified in 68.42(b)(1) through (11) for each accidental release.
- 483 [40 CFR 68.65(d)(2)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Document that equipment complies with recognized and generally accepted good engineering practices. [40 CFR 68.65(d)(2)]
- 484 [40 CFR 68.65(d)(3)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Document that existing equipment, designed and constructed in accordance with codes, standards, or practices that are no longer in general use, is designed, maintained, inspected, tested, and operating in a safe manner. [40 CFR 68.65(d)(3)]
- 485 [40 CFR 68.65(d)(3)] Determine that existing equipment, designed and constructed in accordance with codes, standards, or practices that are no longer in general use, is designed, maintained, inspected, tested, and operating in a safe manner. [40 CFR 68.65(d)(3)]
- 486 [40 CFR 68.67(e)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Document the resolution of the recommendations of the team performing the process hazard analysis, and what actions are to be taken. [40 CFR 68.67(e)]

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

UNF 0001 - Cathyval Plant

- 487 [LAC 33:III.1103] Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited.
- 488 [LAC 33:III.1109.B] Outdoor burning of waste material or other combustible material is prohibited.
- 489 [LAC 33:III.1303.B] Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
- 490 [LAC 33:III.2113.A] Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
- 491 [LAC 33:III.219] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- 492 [LAC 33:III.2901.D] Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
- 493 [LAC 33:III.2901.F] If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.
- 494 [LAC 33:III.501.C.1] Submit permit application: Due prior to construction, reconstruction or modification unless otherwise provided in LAC 33:III.Chapter 5. Submit a timely and complete permit application to the Office of Environmental Services, Air Permits Division as required in accordance with the procedures in LAC 33:III.Chapter 5.
- 495 [LAC 33:III.507.E.4] Any permit application to renew an existing permit shall be submitted at least six months prior to the date of permit expiration, or at such earlier time as may be required by the existing permit or approved by the permitting authority. In no event shall the application for permit renewal be submitted more than 18 months before the date of permit expiration.
- 496 [LAC 33:III.5105.A.1] Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard.
- 497 [LAC 33:III.5105.A.2] Do not cause a violation of any ambient air standard listed in LAC 33:III.Table 51.2, unless operating in accordance with LAC 33:III.5109.
- 498 [LAC 33:III.5105.A.3] Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
- 499 [LAC 33:III.5105.A.4] Do not fail to keep records, notify, report or revise reports as required under LAC 33:III.Chapter 51.Subchapter A.
- 500 [LAC 33:III.5107.A.1] Submit Annual Emissions Report: Due annually, by the 30th of April unless otherwise directed by DEQ, to the Office of Environmental Services in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.
- 501 [LAC 33:III.5107.A.3] Include a certification statement with initial and subsequent annual emission reports and revisions to any emission report to attest that the information contained in the emission report is true, accurate, and complete, and signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official. The certification statement shall read: "I certify, under penalty of perjury, that the emissions data provided is accurate to the best of my knowledge, information, and belief, and I understand that submitting false or misleading information will expose me to prosecution under state regulations"

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

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- 502 [LAC 33:III.5107.B.1] Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but no later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere which results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).
- 503 [LAC 33:III.5107.B.2] Submit notification: Due to the Office of Environmental Compliance, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.Chapter 51.Table 51.1 or a reportable quantity (RQ) in LAC 33:I.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:I.3923.
- 504 [LAC 33:III.5107.B.3] Submit notification: Due to the Office of Environmental Compliance immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:I.3931, except as provided in LAC 33:III.5107.B.6. Submit notification in the manner provided in LAC 33:I.3923.
- 505 [LAC 33:III.5107.B.4] Submit written report: Due within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through 3. Submit report to the Office of Environmental Compliance by certified mail. Include the information specified in LAC 33:III.5107.B.4.a.i through viii.
- 506 [LAC 33:III.5107.B.5] Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, in the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
- 507 [LAC 33:III.5109.B.3] Achieve compliance with ambient air standards unless it can be demonstrated to the satisfaction of DEQ that compliance with an ambient air standard would be economically infeasible; that emissions could not reasonably be expected to pose a threat to public health or the environment; and that emissions would be controlled to a level that is Maximum Achievable Control Technology.
- 508 [LAC 33:III.5111.A.2.a] Obtain a permit modification in accordance with LAC 33:III.5111.B and C before commencement of any modification not specified in a compliance plan submitted under LAC 33:III.5109.D, if the modification will result in an increase in emissions of any toxic air pollutant or will create a new point source.
- 509 [LAC 33:III.5111.A] Do not commence construction or modification of any major source without first obtaining written authorization from DEQ, as specified.
- 510 [LAC 33:III.5113.B.1] Ensure that all testing done to determine the emission of toxic air pollutants, upon request by the department, is conducted by qualified personnel.
- 511 [LAC 33:III.5113.B.2] Conduct emission tests as set forth in accordance with Test Methods of 40 CFR, parts 60, 61, and 63 or in accordance with alternative test methods approved by DEQ.
- 512 [LAC 33:III.5113.B.3] Provide necessary sampling and testing facilities, exclusive of instruments and sensing devices, as needed to properly determine the emission of toxic air pollutants, upon request of the department.
- 513 [LAC 33:III.5113.B.4] Provide emission testing facilities as specified in LAC 33:III.5113.B.4.a through e.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

UNF 0001 - Cathyval Plant

- 514 [LAC 33:III.5113.B.5] Submit certified letter: Due to the Office of Environmental Services before the close of business on the 45th day following the completion of the emission test. Report the determinations of the emission test.
- 515 [LAC 33:III.5113.B.5] Analyze samples and determine emissions within 30 days after each emission test has been completed.
- 516 [LAC 33:III.5113.B.6] Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of emissions testing. Retain records of emission test results and other data needed to determine emissions. Retained records at the source, or at an alternate location approved by DEQ for a minimum of two years, and make available upon request for inspection by DEQ.
- 517 [LAC 33:III.5113.B.7] Submit notification: Due to the Office of Environmental Services at least 30 days before the emission test. Submit notification of emission test to allow DEQ the opportunity to have an observer present during the test.
- 518 [LAC 33:III.5113.C.1] Maintain and operate each monitoring system in a manner consistent with good air pollution control practices for minimizing emissions. Repair or adjust any breakdown or malfunction of the monitoring system as soon as practicable after its occurrence.
- 519 [LAC 33:III.5113.C.2] Submit notification in writing: Due to the Office of Environmental Services at least 30 days before a performance evaluation of the monitoring system is to begin.
- 520 [LAC 33:III.5113.C.3] Install a monitoring system on each effluent or on the combined effluent, when monitoring is required and the effluents from a single source, or from two or more sources subject to the same emission standards, are combined before being released to the atmosphere. If two or more sources are not subject to the same emission standards, install a separate monitoring system on each effluent, unless otherwise specified. If the applicable standard is a mass emission standard and the effluent from one source is released to the atmosphere through more than one point, install a monitoring system at each emission point unless DEQ approves the installation of fewer systems.
- 521 [LAC 33:III.5113.C.5.a] Submit report: Due to DEQ within 60 days of the performance evaluation of the CMS, if requested. Furnish DEQ with two or more copies of a written report of the test results within 60 days.
- 522 [LAC 33:III.5113.C.5.d] Install all continuous monitoring systems or monitoring devices to make representative measurements under variable process or operating parameters, if required to install a CMS.
- 523 [LAC 33:III.5113.C.5.e] Collect and reduce all data as specified in LAC 33:III.5113.C.5.e.i and ii, if required to install a CMS.
- 524 [LAC 33:III.5113.C.5] Submit plan: Due to the Office of Environmental Services within 90 days after DEQ requests either the initial plan or an updated plan, if required by DEQ to install a continuous monitoring system. Submit for approval a plan describing the affected sources and the methods for ensuring compliance with the continuous monitoring system.
- 525 [LAC 33:III.5113.C.7] Maintain records of monitoring data, monitoring system calibration checks, and the occurrence and duration of any period during which the monitoring system is malfunctioning or inoperative. Maintain these records at the source, or at an alternative location approved by DEQ, for a minimum of three years and make available, upon request, for inspection by DEQ.
- 526 [LAC 33:III.5151.F.1.f] An individual or company contracted to perform a demolition or renovation activity which disturbs RACM must be recognized by the Licensing Board for Contractors to perform asbestos abatement, and shall meet the requirements of LAC 33:III.5151.F.2 and F.3 for each demolition or renovation activity.
- 527 [LAC 33:III.517.A.1] Submit permit application: Due prior to commencement of construction, reconstruction, or modification of the source, for new or modified sources. Do not commence construction, reconstruction, or modification of any source required to be permitted under LAC 33:III.Chapter 5 prior to approval by the permitting authority.
- 528 [LAC 33:III.5609.A.1.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611.Table 5 when the administrative authority declares an Air Pollution Alert.

SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc

Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

UNF 0001 - Cathyval Plant

- 529 [LAC 33:III.5609.A.3.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611.Table 7 when the administrative authority declares an Air Pollution Emergency.
- 530 [LAC 33:III.5609.A] Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency. Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611.Tables 5, 6, and 7.
- 531 [LAC 33:III.5901.A] Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.
- 532 [LAC 33:III.5907] Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur.
- 533 [LAC 33:III.913] Provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of emission limits.
- 534 [LAC 33:III.919] Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 30th of April to the Office of Environmental Services, for the reporting period of the previous calendar year that coincides with period of ownership or operatorship, unless otherwise directed by DEQ. Submit both an emissions inventory and the certification statement required by LAC33:III.919.F.1.c, separately for each AI, in a format specified by DEQ. Include the information specified in LAC 33:III.919.F.1.a - F.1.d.
- 535 [LAC 33:III.927] Report the unauthorized discharge of any air pollutant into the atmosphere in accordance with LAC 33:I.Chapter 39, Notification Regulations and Procedures for Unauthorized Discharges. Submit written reports to the department pursuant to LAC 33:I.3925. Submit timely and appropriate follow-up reports detailing methods and procedures to be used to prevent similar atmospheric releases.



March 26, 2012

Mr. Sanford Phillips, Assistant Secretary (**Hand Delivered, original + 2 copies**)
Office of Environmental Services; Air Permits Division
Louisiana Department of Environmental Quality
P.O. Box 4313
Baton Rouge, LA 70821-4313

EPA Region 6 (6PD-R), **Certified Mail 7010 1670 0001 8962 9180**
1445 Ross Avenue, Ste. 1200
Dallas, TX 75202-2733

RECEIVED - 6PDL
AIR PLANNING SEC.
12 APR - 3 PM 2:23

Re: Application for **Minor Permit Modification to Part 70 Permit**
Rhodia, Inc. CATHYVAL Plant Permit No. 2184-V2
AI# 1314

Dear Mr. Phillips,

On 4-25-11, LDEQ issued a Title V Permit Renewal to Rhodia for the CATHYVAL Plant. On 12-8-11, LDEQ issued a variance to allow increased hours of scrubber hot water wash; condition no. 1 of the variance requires that a permit modification application be submitted by 3-30-12 to make the change permanent. The permit modification application is enclosed; it also proposes other minor corrections/updates to the permit.

Rhodia requests that minor permit modification procedures be used. The requested changes do not modify, remove, or add any federally-enforceable applicable requirements nor have any new federally-enforceable requirements become applicable since the last permit modification/renewal. A draft permit is not included (per LAC 33:III.525.B.2.c) because the requested changes are minor and the overall permit will remain largely unchanged. As required by LAC 33:III.525.B.2.b, by signature below, I certify that the proposed modification meets the criteria in LAC 33:III.525.A.2 for a minor modification.

If you have any questions or require any further information, please call John Richardson at 359-3768 or Julie Sheffield at 359-3432.

Sincerely,

Daniel Tate
Plant Manager

File 402.4.2

Rhodia Inc., P.O. Box 828, Baton Rouge, LA 70821



LOUISIANA DEPARTMENT OF ENVIRON
QUALITY
PO Box 4311
BATON ROUGE LA 70821-4311

Rhodia Inc
CN 1120
Cranbury, NJ 08512
Tel: Help Desk, 1-800-717-8252

Page 1 of 1
Check : 0005001465
Date : 12/27/2011

1002682 / LOUISIANA DEPARTMENT OF ENVIRON

Invoice Number Remarks/Description	Invoice Date	PO number	Gross amount	Discount Amount	Net amount
CR121911	12/19/2011	1900019050	1,886.00	0.00	1,886.00
Total :			1,886.00	0.00	1,886.00

THE ORIGINAL DOCUMENT HAS A WHITE REFLECTIVE WATERMARK ON THE BACK. HOLD AT AN ANGLE TO VIEW. DO NOT CASH IF NOT PRESENT.



Rhodia Inc
CN 1120
Cranbury, NJ 08512

HSBC BANK, USA
ONE HSBC CENTER
BUFFALO, NY 14203

50-682
213

0005001465
DATE 12/27/2011

***1,886.00
US DOLLARS

PAY TO THE ORDER OF- LOUISIANA DEPARTMENT OF ENVIRON

ONE THOUSAND EIGHT HUNDRED EIGHTY-SIX USD ***

LOUISIANA DEPARTMENT OF ENVIRON
QUALITY
PO Box 4311
BATON ROUGE LA 70821-4311

Rhodia Inc
Authorized signature

0005001465 021306822 797302697

Department of Environmental Quality
Office of Environmental Services
Air Permits Division
P.O. Box 4313
Baton Rouge, LA 70821-4313
(225) 219-3181

LOUISIANA

Application for Approval of Emissions of Air Pollutants from Part 70 Sources



PLEASE TYPE OR PRINT

1. Facility Information [LAC 33:III.517.D.1]

Facility Name or Process Unit Name (if any) Rhodia Baton Rouge CATHYVAL Plant		<input type="checkbox"/> All Process Units <input checked="" type="checkbox"/> Process Unit-Specific Permit
Agency Interest Number (A.I. Number) 1314	Currently Effective Permit Number(s) 2184-V2	
Company - Name of Owner Rhodia, Inc.		
Company - Name of Operator (if different from Owner)		
Parent Company (if Company - Name of Owner given above is a division) The Solvay Group		

Ownership:

Check the appropriate box.

☒ corporation, partnership, or sole proprietorship

☐ regulated utility

☐ municipal government

☐ state government

☐ federal government

☐ other, specify _____

2. Physical Location and Process Description

[LAC 33:III.517.D.18, unless otherwise stated]

What does this facility produce? Add more rows as necessary

This plant produces fine organic specialty chemicals that are used in food, fragrances, pharmaceuticals, and as laboratory reagents.

What modifications/changes are proposed in this application? Add more rows as necessary.

see next page

Nearest town (in the same parish as the facility):

Parish(es) where facility is located:

Baton Rouge

East Baton Rouge

Distance To (mi):	~222	Texas	~269	Arkansas	~129	Mississippi	~262	Alabama
Latitude Front Gate:	30	Deg	30	Min	30	Sec	30	Hundredths
Longitude Front Gate:	-91	Deg	11	Min	16	Sec	58	Hundredths
Distance from nearest Class I Area	225 Kilometers							

Add physical address and description of location of the facility below. If the facility has no address, provide driving directions. Add more rows as necessary.

1275 Airline Highway, Baton Rouge, LA 70805. Rhodia is located immediately north of Highway 190 along the east bank of the Mississippi River.

☒ Map attached (required per LAC 33:III.517.D.1)

☐ Description of processes and products attached (required per LAC 33:III.517.D.2) NOTE: no change from current permit

☒ Introduction/Description of the proposed project attached (required per LAC 33:III.517.D.5)

What modifications/changes are proposed in this application? Add more rows as necessary.

Modifications Addressed in Permit Application Forms:

- Hours of hot water wash are being increased for three scrubbers, EQTs 0076, 0082, and 0094 (EQIs 301, 302, and 304) and the hourly emission rates during hot water wash are being lowered for some pollutants. EIQ forms are included for the change in emissions.
- Per discussions with LDEQ Emission Inventory and Permit personnel in April 2011 while preparing 2010 ERIC report, emissions of particulate matter should not be speciated into TAP compounds if present. Revised EIQ forms for EQTs 0075, 0110, 0111, 0112, and 0116 (EQIs 203, 311, 312, 313, and 317) are included to make this change.
- EIQ forms are included for 3 engines (EQTs 0286, 0287, and 0288 which are EQIs M-8A, M-8B, and M-9) to provide stack discharge characteristics which were missing on the previously submitted EIQ forms.
- The portable diesel pump for stormwater is being removed from the GC 17 list because it is not required to be listed in the permit.

Other Modifications/Corrections:

- To allow the increase in scrubber hot water wash hours, for EQT 0076 (EIQ 301), change SR# 195 as follows: "For up to 70-100 hours per year, if/when scrubber becomes plugged during normal operation, scrubber water temperature will be increased to remove pluggage and restore proper operation. STATE ONLY"
- To allow the increase in scrubber hot water wash hours, EQT 0082 (EIQ 302), change SR# 208 as follows: "For up to 16 100 hours per year, if/when scrubber becomes plugged during normal operation, scrubber water temperature will be increased to remove pluggage and restore proper operation."
- To allow the increase in scrubber hot water wash hours, EQT 0094 (EIQ 304), change SR# 233 as follows: "For up to 16 100 hours per year, if/when scrubber becomes plugged during normal operation, scrubber water temperature will be increased to remove pluggage and restore proper operation. STATE ONLY"
- EQT 0210 "C-440 - Solvent 2 Washing Column" was added to the permit with version V1 issued 4-20-07. In a 9-4-07 amendment to permit V1, the name of the source was inexplicably and incorrectly changed from C-440 to C-441 in the Inventory but remained correct as "C-440" but in the Specific Requirements. Then, with the V2 permit issued 4-25-11, both Inventory and Specific Requirements have it incorrectly as "C-441". Please change the name of EQT 0210 back to the correct name "C-440 - Solvent 2 Washing Column".
- Please delete SR# 489 for UNF 0001; it is redundant with General Conditions (Part 82, Subpart F).
- Please delete SR# 509 for UNF 0001; this requirement is obsolete (TEDI report).
- Please revise SR# 555 for UNF 0001 to include the new due date of the annual inventory (ERIC) which is April 30th. The appropriate requirement is this item from the Air Requirements Library "Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 30th of April to the Office of Environmental Services, for the reporting period of the previous calendar year that coincides with period of ownership or operatorship, unless otherwise directed by DEQ. Submit both an emissions inventory and the certification statement required by LAC 33:III.919.F.1.c, separately for each AI, in a format specified by DEQ. Include the information specified in LAC 33:III.919.F.1.a through F.1.d. [LAC 33:III.919]"
- Please revise SR #s 258, 261, 413, 459 (for EQTs 0113, 0114, and 0288 and GRP 0022) per the April 2011 revision to LAC 33:III.1101. The correct citation for this equipment is LAC 33:III.1101.B which states "The emission of smoke generated by the burning of fuel or combustion of waste material in a combustion unit, including the incineration of industrial, commercial, institutional and municipal wastes, shall be controlled so that the shade or appearance of the emission is not darker than 20 percent average opacity, except that such emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes."
- Please revise the regulatory citation for SR#s 128, 188, and 249 (for EQTs 0051, 0075, and 0106) to be "LAC 33:III.1311.B" which is more accurate than "LAC 33:III.501.C.6" and is also consistent with SR#s 250, 252, 253, 254, 256, and 264.
- Please revise SR#s 260 and 263 (for EQTs 0113 and 0114) per the November 2011 revision to LAC 33:III.1513. The appropriate requirement for this equipment is this item from the Air Requirements Library "Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions. [LAC 33:III.1513.C]"
- Please revise SR# 130 for EQT 0051 as follows "Scrubber must operate at all times that the baghouse blower is operational" The original text was in error because this scrubber controls particulate matter, not organics.

3. Confidentiality [LAC 33.I.Chapter 5]

Are you requesting confidentiality for any information except air pollutant emission rates?

☐ Yes ☒ No

If "yes," list the sections for which confidentiality is requested below. Add rows as necessary. Confidentiality requests require a submittal that is separate from this application. Information for which confidentiality is requested should not be submitted with this application. Consult instructions.

4. Type of Application [LAC 33:III.517.D]

Complete the appropriate column (1 or 2) that corresponds to the type of permit being sought. Check all that apply within the appropriate column.

Column 1	Column 2
<input type="checkbox"/> Part 70 General	<input checked="" type="checkbox"/> Part 70 Regular
<input type="checkbox"/> Renewal	<input type="checkbox"/> Renewal
Select one, if applicable: <input type="checkbox"/> Entirely new facility <input type="checkbox"/> Modification or expansion of existing facility (may also include reconciliations) <input type="checkbox"/> Reconciliation only <input type="checkbox"/> Individual emissions unit(s) addition	Select one, if applicable: <input type="checkbox"/> Entirely new facility <input type="checkbox"/> Significant modification or expansion of existing facility (may also include reconciliations) [LAC 33:III.527] <input type="checkbox"/> Minor modification or expansion of existing facility (may also include reconciliations) [LAC 33:III.525] <input checked="" type="checkbox"/> Reconciliation only NSR Analysis: <input type="checkbox"/> PSD <input type="checkbox"/> NNSR

Does this submittal update or replace an application currently under review?

☐ Yes ☒ No

If yes, provide date that the prior application was submitted:

Select one if this application is for an existing facility that does not have an air quality permit:

- ☐ Previously Grandfathered (LAC 33:III.501.B.6)
☐ Previously Exempted (e.g., Small Source Exemption; LAC 33:III.501.B.2.d)
☐ Previously Unpermitted

5. Fee Information [LAC 33:III.517.D.17]

Fee Parameter: If the fee code is based on an operational parameter (such as number of employees or capital cost), enter that parameter here. per ton daily rate capacity

Industrial Category: Enter the Standard Industrial Classification (SIC) and North American Industry Classification (NAICS) Codes that apply to the facility.

Primary SICC: 2869 **NAICS Code:** 325199

Secondary SICC(s): N/A

Project Fee Calculation: Enter fee code, permit type, production capacity/throughput, and fee amount pursuant to LAC 33:III.Chapter

2. Add rows to this table as needed. Include with the application the amount in the Grand Total blank as the permit application fee.

FEE CODE	TYPE	EXISTING CAPACITY	INCREMENTAL CAPACITY INCREASE	SURCHARGES				TOTAL AMOUNT
				MULTIPLIER	NPS	PSD	AIR TOXICS	
0630		88MMlb	NA		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ 1,866.00
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
GRAND TOTAL								\$ 1,866.00

****Optional** Fee Explanation:** Use the space provided to give an explanation of the fee determination displayed above. Using this area will help to avoid confusion.

Minimum minor mod fee applies per LAC 33:III.211.B.13.d.

Electronic Fund Transfer (EFT): If paying the permit application fee using an Electronic Fund Transfer (EFT), please include the EFT Transaction Number, the Date that the EFT was made, and the total dollar amount submitted in the EFT. If not paying the permit application fee using EFT, leave blank.

EFT Transaction Number

Date of Submittal

Total Dollar Amount

\$

6. Key Dates

Estimated date construction will commence:

NA

Estimated date operation will commence:

NA

7. Pending Permit Applications – For Process Unit-Specific Permits Only

[LAC 33:III.517.D.18]

List all other process units at this facility for which Part 70 permit applications have been submitted, but have not been acted upon by LDEQ as of the date of submittal of this application. If none, state "none" in the table. *****It is not necessary to update this table during the permit review process, unless requested by LDEQ.*****

Process Unit Name	Permit Number	Date Submitted
Sulfuric Acid Plant	08840-00033-V3	December 20, 2011

8. LAC 33:I.1701 Requirements – Answer all below for new sources and permit renewals -

☐ Yes ☐ No

Does the company or owner have federal or state environmental permits identical to, or of a similar nature to, the permit for which you are applying in Louisiana or other states? (This requirement applies to all individuals, partnerships, corporations, or other entities who own a controlling interest of 50% or more in your company, or who participate in the environmental management of the facility for an entity applying for the permit or an ownership interest in the permit.)

☐ Yes ☐ No

If yes, list States:

Do you owe any outstanding fees or final penalties to the Department?

If yes, explain below. Add rows if necessary.

☐ Yes ☐ No

Is your company a corporation or limited liability company?

☐ Yes ☐ No

If yes, attach a copy of your company's Certificate of Registration and/or Certificate of Good Standing from the Secretary of State. The appropriate certificate(s) should be attached to the end of this application as an appendix.

9. Permit Shield Request [LAC 33:III.517.E.7]☐ Yes☒ No

no new shields being requested

If yes, check the appropriate boxes to indicate the type of permit shield being sought. Include the specific regulatory citation(s) for which the shield is being requested. Give an explanation of the circumstances that will justify the permit shield request. Attach additional pages if necessary. If additional pages are used, attach them directly behind this page and enter "See Attached Pages" into the Explanation field.

Type of Permit Shield request (check all that apply):

Non-applicability determination for:	Specific Citation(s)	Explanation
<input type="checkbox"/> 40 CFR 60		
<input type="checkbox"/> 40 CFR 61		
<input type="checkbox"/> 40 CFR 63		
<input type="checkbox"/> Prevention of Significant Deterioration		
<input type="checkbox"/> Nonattainment New Source Review		

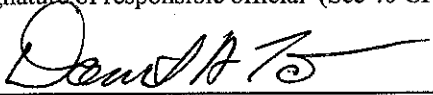
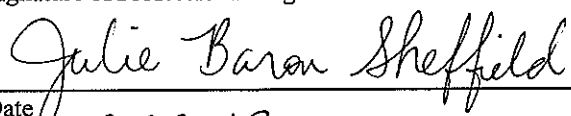
Interpretation of monitoring, recordkeeping, and/or reporting requirements, and/or means of compliance for:	Specific Citation(s)	Explanation
<input type="checkbox"/> 40 CFR 60		
<input type="checkbox"/> 40 CFR 61		
<input type="checkbox"/> 40 CFR 63		
<input type="checkbox"/> Prevention of Significant Deterioration		
<input type="checkbox"/> Nonattainment New Source Review		
<input type="checkbox"/> State Implementation Plan (SIP) Regulation(s) referenced in 40 CFR 52 Subpart T		

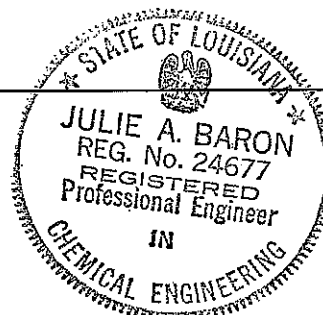
10. Certification of Compliance with Applicable Requirements

Statement for Applicable Requirements for Which the Company and Facility Referenced In This Application Is In Compliance

Based on information and belief, formed after reasonable inquiry, the company and facility referenced in this application is in compliance with and will continue to comply with all applicable requirements pertaining to the sources covered by the permit application, as outlined in Tables 1 and 2 in the permit application. For requirements promulgated as of the date of this certification with compliance dates effective during the permit term, I further certify that the company and facility referenced in this application will comply with such requirements on a timely basis and will continue to comply with such requirements.

For corporations only: By signing this form, I certify that, in accordance with the definition of Responsible Official found in LAC 33:III.502, (1) I am a president, secretary, treasurer, or vice-president in charge of a principal business function, or other person who performs similar policy or decision-making functions; or (2) I am a duly authorized representative of such person; am responsible for the overall operation of one or more manufacturing, production, or operating facilities addressed in this permit application; and either the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars); or the delegation of authority has been approved by LDEQ prior to this certification.*

CERTIFICATION: I certify, under provisions in Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information contained in this Application for Approval of Emissions of Air Pollutants from Part 70 Sources, including all attachments thereto and the compliance statement above, are true, accurate, and complete.			CERTIFICATION: I certify that the engineering calculations, drawings, and design are true and accurate to the best of my knowledge.		
a. Responsible Official			b. Professional Engineer		
Name Daniel Tate			Name Julie Baron Sheffield		
Title Plant Manager			Title Environmental Consultant		
Company Rhodia, Inc.			Company JBS, L.L.C.		
Suite, mail drop, or division			Suite, mail drop, or division		
Street or P.O. Box PO Box 828			Street or P.O. Box PO Box 828		
City Baton Rouge	State LA	Zip 70821	City Baton Rouge	State LA	Zip 70821
Business phone (225) 359-3751			Business phone (225) 359-3432		
Email Address Daniel.Tate@US.RHODIA.com			Email Address Julie.Sheffield@US.RHODIA.com		
Signature of responsible official (See 40 CFR 70.2) 			Signature of Professional Engineer 		
Date 3/29/12			Date 3-23-12		
*Approval of a delegation of authority can be requested by completing a Duly Authorized Representative Designation Form (Form 7218) available on LDEQ's website at http://www.deq.louisiana.gov/portal/tabid/2758/Default.aspx			Louisiana Registration No. 24677		



11. Personnel [LAC 33:III.517.D.1]**a. Manager of Facility who is located at plant site**

Name <input type="checkbox"/> Primary Contact		
Daniel Tate		
Title		
Plant Manager		
Company		
Rhodia, Inc.		
Suite, mail drop, or division		
Street or P.O. Box		
PO Box 828		
City	State	Zip
Baton Rouge	LA	70821
Business phone		
(225) 359-3751		
Email Address		
<u>Daniel.Tate@US.RHODIA.com</u>		

b. On-site contact regarding air pollution control

Name <input type="checkbox"/> Primary Contact		
John Richardson		
Title		
Environmental Manager		
Company		
Rhodia, Inc.		
Suite, mail drop, or division		
Street or P.O. Box		
PO Box 828		
City	State	Zip
Baton Rouge	LA	70821
Business phone		
(225) 359-3768		
Email Address		
<u>John.Richardson@US.RHODIA.com</u>		

c. Person to contact with written correspondence

Name <input type="checkbox"/> Primary Contact		
John Richardson		
Title		
Environmental Manager		
Company		
Rhodia, Inc.		
Suite, mail drop, or division		
Street or P.O. Box		
PO Box 828		
City	State	Zip
Baton Rouge	LA	70821
Business phone		
(225) 359-3768		
Email Address		
<u>John.Richardson@US.RHODIA.com</u>		

d. Person who prepared this report

Name <input checked="" type="checkbox"/> Primary Contact		
Julie Sheffield		
Title		
Environmental Consultant		
Company		
JBS, LLC		
Suite, mail drop, or division		
Street or P.O. Box		
PO Box 828		
City	State	Zip
Baton Rouge	LA	70821
Business phone		
(225) 359-3432		
Email Address		
<u>Julie.Sheffield@US.RHODIA.com</u>		

e. Person to contact about Annual Maintenance Fees

Name		Street or P.O. Box	
John Richardson		PO Box 828	
Title		City	State
Environmental Manager		Baton Rouge	LA
Company		Zip	
Rhodia, Inc.		70821	
Suite, mail drop, or division		Business phone	
		(225) 359-3768	
		Email Address	
		<u>John.Richardson@US.RHODIA.com</u>	

12. Proposed Project Emissions [LAC 33:III.517.D.3]

List the total emissions following the proposed project for this facility or process unit (for process unit-specific permits). Speciate all criteria pollutants, TAP, and HAP for the proposed project.

Pollutant	Proposed Emission Rate (tons/yr)
PM ₁₀	1.99
SO ₂	0.16
NO _x	6.19
CO	3.98
VOC Total	27.49
Ethyl Chloride	0.12
Hydroquinone	0.09
Methanol	3.38
Methyl Chloride	0.23
Methyl Isobutyl Ketone	9.45
Phenol	0.39
Pyrocatechol	0.21

13. History of Permitted Emissions [LAC 33:III.517.D.18]

List each of the following in chronological order:

- The Permit Number and Date Action Issued for each air quality permit that has been issued to this facility or process unit (for process unit-specific permits) within the last ten (10) years.
- All small source exemptions, authorizations to construct, administrative amendments, case-by-case insignificant activities, and changes of tank service that have been approved since the currently effective Title V Operating Permit or State Operating Permit was issued to this facility or process unit (for process unit-specific permits). It is not necessary to list any such activities issued prior to the issuance of the currently effective Title V Operating Permit or State Operating Permit, if one exists.

Permit Number	Date Action Issued
2184-V0	August 15, 2005
2184-V1 (permit mod)	April 20, 2007
2184-V1 (amended permit)	September 4, 2007
2184-V2 (renewal)	April 25, 2011

14.a. Enforcement Actions [LAC 33:III.517.D.18] -

☐ Yes ☒ No

If yes, list all federal and state air quality enforcement actions, settlement agreements, and consent decrees received for this facility and/or process unit (for process unit-specific permits) since the issuance of the currently effective Title V Operating Permit or State Operating Permit. For each action, list the type of action (or its tracking number), the regulatory authority or authorities that issued the action, and the date that the action was issued. Summarize the conditions imposed by the enforcement action, settlement agreement, and consent decree in Section 23, Table 2. It is not necessary to submit a copy of the referenced action. Add rows to table as necessary.

Type of Action or Tracking Number	Issuing Authority	Date Action Issued	Summary of Conditions Included?
			<input type="checkbox"/> Yes <input type="checkbox"/> No

14.b. Schedule for Compliance [LAC 33:III.517.E.4]☐ Yes ☒ No

If the facility or process unit for which application is being made is not in full compliance with all applicable regulations, give a description of how compliance will be achieved, including a schedule for compliance below. Add rows as necessary. See instructions.

15. Letters of Approval for Alternate Methods of Compliance -☐ Yes ☒ No

If yes, list all correspondence with LDEQ, EPA, or other regulatory bodies that provides for or supports a request for alternate methods of compliance with any applicable regulations for this facility or process unit (for process unit-specific permits). List the date of issuance of the letter and the regulation referenced by the letter. **Attach as an appendix a copy of all documents referenced in this table.** Letters that are not included may not be incorporated into a final permit. Add rows to table as necessary.

Date Letter Issued	Issuing Authority	Referenced Regulation(s)	Copy of Letter Attached?
none since last permit issued			<input type="checkbox"/> Yes <input type="checkbox"/> No
			<input type="checkbox"/> Yes <input type="checkbox"/> No

16. Initial Notifications and Performance Tests [LAC 33:III.517.E.1]☐ Yes ☒ No

If yes, list any initial notifications that have been submitted or one-time performance tests that have been performed for this facility or process unit (for process unit-specific permits) since the issuance of the currently effective Title V Operating Permit or State Operating Permit in order to satisfy regulatory requirements. Any initial notification or one-time performance test requirements that have not been satisfied should be listed in Section 23, Table 2 of this application. Any notifications or performance tests that recur periodically should also be properly noted in Section 23, Table 2 of this application. Add rows to table as necessary.

Initial Notification or One-time Performance Test?	Regulatory Citation Satisfied	Applicable Source(s)	Date Completed/Approved

17. Existing Prevention of Significant Deterioration or Nonattainment New Source Review Limitations [LAC 33:III.517.D.18]

Do one or more emissions sources represented in this permit application currently operate under one or more NSR permits?

☐ Yes ☒ No

If "yes," summarize the limitations from such permit(s) in the following table. Add rows to table as necessary. Be sure to note any annual emissions limitations from such permit(s) in Sections 13 and 14 of this application.

Permit Number	Date Issued	Emission Point ID No.	Pollutant	BACT/LAER Limit ¹	Averaging Period	Description of Control Technology/Work Practice Standards

¹For example, lb/MM Btu, ppmvd @ 15% O₂, lb/ton, lb/hr

18. Air Quality Dispersion Modeling [LAC 33:III.517.D.15]

Was Air Quality Dispersion Modeling as required by LAC 33:III performed in support of this permit application? (Air Quality Dispersion Modeling is only required when applying for PSD permits and as requested by LDEQ.)

☐ Yes ☒ No

Has Air Quality Dispersion Modeling completed in accordance with LAC 33:III ever been performed for this facility in support of a air permit application previously submitted for this facility or process unit (for process unit-specific permits) or as required by other regulations AND approved by LDEQ?

☒ Yes ☐ No

If yes, enter the date the most recent Air Quality Dispersion Modeling results as required by LAC 33:III were submitted:

March 2005 for MIBK

If the answer to either question above is "yes," enter a summary of the most recent results in the following table. If the answer to both questions is "no," enter "none" in the table. Add rows to table as necessary.

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Standard or (National Ambient Air Quality Standard {NAAQS})
MIBK	8-hour	323 $\mu\text{g}/\text{m}^3$	4880 $\mu\text{g}/\text{m}^3$

19. General Condition XVII Activities -

☒ Yes ☐ No

Enter all activities that qualify as Louisiana Air Emissions Permit General Condition XVII Activities.

- Expand this table as necessary to include all such activities.
- See instructions to determine what qualifies as a General Condition XVII Activity.
- Do not include emissions from General Condition XVII Activities in the proposed emissions totals for the permit application.

		Emission Rates – TPY							
Work Activity	Schedule	PM ₁₀	SO ₂	NO _x	CO	VOC	Other		
Note: Edits from current GCXVII List shaded gray.									
Collecting process samples for quality assurance. Collected in 4-oz bottles. Assume a max of 1% emitted to the atmosphere.	220 samples per week					0.01	PC HQ phenol MIBK MeOH EtCl MeCl	<0.01 <0.01 <0.01 <0.01 <0.01 <0.01 <0.01	
Drum loading, unloading, and heating						0.22			
Phenol melting						0.02	phenol	0.02	
Maintenance Activities, including: Opening/removing pumps, compressors, instruments, valves, vents, and piping; Vessel/equipment/tank truck/ISO container/rail car openings; Filter and strainer change-outs; Miscellaneous equipment cleaning; Nitrogen/steam/air clearing of equipment and lines; Waste handling/re-packaging						0.25	PC HQ phenol MIBK MeOH EtCl MeCl	0.03 0.03 0.03 0.03 0.03 0.03 0.03	
Temporary storage of materials in tank trucks or ISO containers						0.05	PC HQ	0.03 <0.01	
Portable Diesel Water Pump(s)									
Fugitive dust		0.05							
Tote Loading of o-Vanillin						0.07			

20. Insignificant Activities [LAC 33:III.501.B.5]

■ Yes □ No

Enter all activities that qualify as Insignificant Activities.

- Expand this table as necessary to include all such activities.
- For sources claimed to be insignificant based on size or emission rate (LAC 33:III.501.B.5.A), information must be supplied to verify each claim. This may include but is not limited to operating hours, volumes, and heat input ratings.
- If aggregate emissions from all similar pieces of equipment (i.e. all LAC 33:III.501.B.5.A.1 activities) claimed to be insignificant are greater than 5 tons per year for any pollutant, then the activities can not be claimed as insignificant and must be represented as permitted emission sources. Consult instructions.

Emission Point ID No.	Description	Physical/Operating Data	Citation
Note: Edits from current permit shaded gray. Caustic tanks are being deleted from this list because they need not be included in a permit application per LAC 33:III.501.B.5.B.			
ID No.	Description	Physical/Operating Data	Citation
	Defoamer for Tars Process	55 gallon drums	LAC 33:III.501.B.5.A.2
	Defoamer for WWTU	55 gallon drums	LAC 33:III.501.B.5.A.2
	Polymer for WWTU - Vulcan 4864	250 gallon totes	LAC 33:III.501.B.5.A.2
D-309X	Clarifier Polymer Feed Tank	1050 gallons	LAC 33:III.501.B.5.A.3
D-407X	Filter Polymer Feed Tank	1690 gallons	LAC 33:III.501.B.5.A.3
D-317X	Polymer Makeup Tank	880 gallons	LAC 33:III.501.B.5.A.3
D-320	Clarifier Floating Layer Tank	750 gallons	LAC 33:III.501.B.5.A.3
D-323	Clarifier Underflow Tank	3170 gallons	LAC 33:III.501.B.5.A.3
D-316	Effluent Pump Tank	4300 gallons	LAC 33:III.501.B.5.A.3
D-420	Filtrate Tank	1260 gallons	LAC 33:III.501.B.5.A.3
C-104	Perchloric Acid Tank, P&ID F103	Vents to Y-132	LAC 33:III.501.B.5.A.4
D-101	H ₂ O ₂ Tank P&ID F102	Vents to Y-120V	LAC 33:III.501.B.5.A.4
D-102	H ₂ O ₂ Tank P&ID F102	Vents to Y-121V	LAC 33:III.501.B.5.A.4
D-106	Polyphosphoric Acid Tank, P&ID F103	Vents to Y-136	LAC 33:III.501.B.5.A.4
D-605	Metabisulfate Injection Tank, P&ID F601	Vents to atmosphere	LAC 33:III.501.B.5.A.4
D-664	Oxalic Acid Injection Drum	Vents to atmosphere	LAC 33:III.501.B.5.A.4
	4 Laboratory Vents	NA	LAC 33:III.501.B.5.A.6
	Analyzer Vents	NA	LAC 33:III.501.B.5.A.9
D-186	Vanessa Caustic Storage	100-900 gallons	LAC 33:III.501.B.5.B.40
D-305	Cathy Caustic Storage, P&ID F-302	1200 gallons	LAC 33:III.501.B.5.B.40
C-210	Daphne Caustic Storage	1200 gallons	LAC 33:III.501.B.5.B.40
C-243	Sulfuric Acid Dilution Tank	958 gallons	LAC 33:III.501.B.5.D

21. Regulatory Applicability for Commonly Applicable Regulations – Answer all below [LAC 33:III.517.D.10]

Does this facility contain asbestos or asbestos containing materials?

□ Yes ■ No

If “yes,” the facility or any portion thereof may be subject to 40 CFR 61, Subpart M, LAC 33:III.Chapter 27, and/or LAC 33:III.5151 and this application must address compliance as stated in Section 23 of this application.

Is the facility or process unit represented in this permit subject to 40 CFR 68, or is any other process unit located at same facility as the process unit represented in this application subject to 40 CFR 68?

■ Yes □ No

If “yes,” the entire facility is subject to 40 CFR 68 and LAC 33:III.Chapter 59 and this application must address compliance as stated in Section 23 of this application.

Is the facility listed in LAC 33:III.5611

Table 5 ☒ Yes ☐ No

Table 6 ☒ Yes ☐ No

Table 7 ☒ Yes ☐ No

Does the applicant own or operate commercial refrigeration equipment normally containing more than 50 pounds of refrigerant at this facility or process unit? ☒ Yes ☐ No

If "yes," the entire facility is subject to 40 CFR 82, Subpart F and this application must address compliance as stated in Section 23 of this application.

22. Applicable Regulations, Air Pollution Control Measures, Monitoring, and Recordkeeping

Important points for Table 1 [LAC 33:III.517.D.10]:

- List in Table 1, by Emission Point ID Number and Descriptive Name of the Equipment, state and federal pollution abatement programs and note the applicability or non-applicability of the regulations to each source.
- Adjust the headings for the columns in Table 1 as necessary to reflect all applicable regulations, in addition to any regulations that do not apply but need an applicability determination to verify this fact.
- For each piece of equipment, enter "1" for each regulation that applies. Enter "2" for each regulation that applies to this type of source, but from which this source of emissions is exempt. Enter "3" for equipment that is subject to a regulation, but does not have any applicable requirements. Also, enter "3" for each regulation that have applicable requirements that apply to the particular emission
- Leave the spaces blank when the regulations clearly would not apply under any circumstances to the source. For example, LAC 33:III.2103 – Storage of Volatile Organic Compounds would never apply to a steam generating boiler, no matter the circumstances.
- Consult instructions.

Important points for Table 2 [LAC 33:III.517.D.4; LAC 33:III.517.D.7; LAC 33:III.517.D.10]:

- For each piece of equipment listed in Table 2, include all applicable limitation, recordkeeping, reporting, monitoring, and testing requirements. Also include any one-time notification or one-time tests performance test requirements that have not been fulfilled.
- Each of these regulatory aspects (limitation, recordkeeping, reporting, etc.) should be addressed for each regulation that is applicable to each emissions source or emissions point.
- For each regulation that provides a choice regarding the method of compliance, indicate the method of compliance that will be employed. It is not sufficient to state that all compliance options will be employed, though multiple compliance options may be approved as alternative operating scenarios.
- Consult instructions.

Important points for Table 3 [LAC 33:III.517.D.16]:

- Each time a 2 or a 3 is used to describe applicability of a source in Table 1, an entry should be made in Table 3 that explains the exemption or non-applicability status of the regulation to that source.
- Fill in all requested information in the table.
- The exact regulatory citation that provides for the specific exemption or non-applicability determination should be entered into the Citation Providing for Exemption or Non-applicability column.
- Consult Instructions.

Important points for Table 4 [LAC 33:III.517.D.18]

- List any single emission source that routes its emissions to another point where these emissions are commingled with the emissions of other sources before being released to the atmosphere. Do not list any single emission source in this table that does not route its emissions in this manner.
- List any and all emission sources that are routed as described above. This includes emission sources that do not otherwise appear in this permit application.
- Consult instructions.

Note: Tables 1-4 are not included. There are no changes to applicable requirements.

23. Emissions Inventory Questionnaire (EIQ) Forms [LAC 33:III.517.D.3; 517.D.6]

Complete one (1) EIQ for:

- Each emission source. If two emission sources have a common stack, the applicant may submit one EIQ sheet for the common emissions point. Note any emissions sources that route to this common point in Table 4 of the application.
- Each emissions CAP that is proposed. In general, this applies to each source that is part of the CAP.
- Each alternate operating scenario that a source may operate under. Some common scenarios are:
 1. Sources that combust multiple fuels
 2. Sources that have Startup/Shutdown max lb/hr emission rates higher than the max lb/hr for normal operating conditions would need an EIQ for the Startup/Shutdown emission rates for those sources
- Fugitive emissions releases. One (1) EIQ should be completed for each of the following types of fugitive emissions sources or
 1. Equipment leaks.
 2. Non-equipment leaks (i.e. road dust, settling ponds, etc).

For each EIQ:

- Fill in all requested information.
- Speciate all Toxic Air Pollutants and Hazardous Air Pollutants emitted by the source.
- Use appropriate significant figures.
- Consult instructions.

The EIQ is in Microsoft Word Excel. Click on this link to get to the EIQ form.

<http://www.deq.louisiana.gov/portal/DIVISIONS/AirPermits/AirPermitApplications.aspx>

24. NSR Applicability Summary [LAC 33:III.504 and LAC 33:III.509]

■ N/A

This section consists of five tables, A-E, and is applicable only to new and existing major stationary sources (as defined in LAC 33:III.504 or in LAC 33:III.509) proposing to permit a physical change or change in the method of operation. It would also apply to existing minor stationary sources proposing a physical change or change in the method of operation where the change would be a major source in and of itself. Add rows to each table as necessary. Provide a written explanation of the information summarized in these tables. Consult instructions.

2/14/2012

2/14/2012

[illegible]

2/14/2012

[illegible]

PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

Instructions: Complete this checklist and submit with the completed air permit application.

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit Application	Yes	No	NA	Location Within the Permit Application
517.A Timely Submittal	Was a Copy of the Application Also Submitted to EPA?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	
517.B.1,2 Certification	Does the Application include a Certification by a Responsible Official?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 10
517.B.3 Certification	Does the Application Include Certification by a Professional Engineer or their Designee:	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 10
517.D.1 Identifying Information	Does the Application Include:				
	1. Company Name, Physical and Mailing Address of Facility?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 2
	2. Map showing Location of the Facility?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Appendix A
	3. Owner and Operator Names and Agent?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 1
	4. Name and Telephone Number of Plant Manager or Contact?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 11
517.D.2 SIC Codes, Source Categories	Does the Application Include a Description of the Source's Processes and Products?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	No change from current permit
	Does the Application Include the Source's SIC Code?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 5
	Does the Application Include EPA Source Category of HAPs if applicable?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.D.3,6 EIQ Sheets	Has an EIQ Sheet been Completed for each Emission Point whether an Area or Point Source?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 23
517.D.4 Monitoring Devices	Does the Application Include Identification and Description of Compliance Monitoring Devices or Activities?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	No change from current permit
517.D.5 Revisions and Modifications Only	For Revisions or Modifications, Does the Application include a Description of the Proposed Change and any Resulting Change in Emissions?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Sections 2, 12, 23
517.D.7 General Information	Does the Application Include Information Regarding Fuels, Fuel Use, Raw Materials, Production Rates, and Operating Schedules as necessary to substantiate emission rates?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Appendix B
517 D.8 Operating Limitations	Has Information Regarding any Limitations on Source Operation or any Applicable Work Practice Standards been Identified?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	No change from current permit
517.D.9 Calculations	Are Emission Calculations Provided?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Appendix B
517.D.10 Regulatory Review	Does the Application Include a Citation and Description of Applicable Louisiana and Federal Air Quality Requirements and Standards?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	No change from current permit

PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

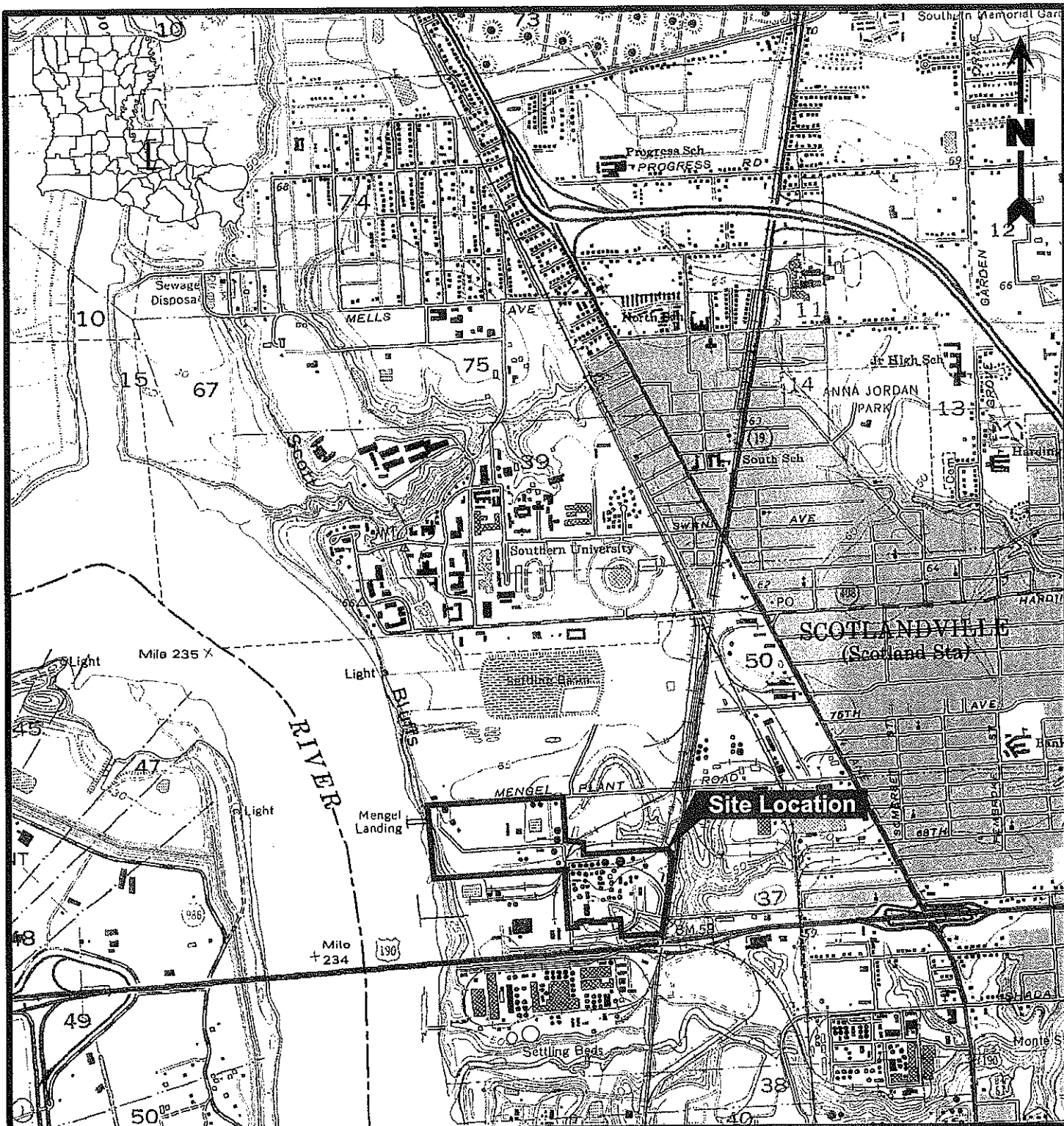
LAC 33:III.	Completeness Questions Relative to the Part 70 Permit	Yes	No	N/A	Location Within the
517.D.11 Test Methods	Has a Description of or a Reference to Applicable Test Methods Used to Determine Compliance with Standards been Provided?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	No change from current permit
517.D.12 Major Sources of TAPs	Does the Application include Information Regarding the Compliance History of Sources Owned or Operated by the Applicant (per LAC 33:III.5111)?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.D.13 Major Sources of TAPs	Does the Application include a Demonstration to show that the Source Meets all Applicable MACT and Ambient Air Standard Requirements?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	No change from current permit
517.D.14 PSD Sources Only	If Required by DEQ, Does the Application Include Information Regarding the Ambient Air Impact for Criteria Pollutants as Required for the Source Impact Analysis per LAC 33:III.509.K,	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517 D.15 PSD Sources Only	If Required by DEQ, Does the Application Include a Detailed Ambient Air Analysis?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.D.16, 18	Has any Additional Information been Provided?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
517.D.17 Fees	Has the Fee Code been Identified?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 5
	Is the Applicable Fee Included with the Application?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	
517.E.1 Additional Part 70 Requirements	Does the Certification Statement Include a Description of the Compliance Status of Each Emission Point in the Source with All Applicable Requirements?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 10
517E.2 Additional Part 70 Requirements	Does the Certification Statement Include a Statement that the Source will continue to Comply with All Applicable Requirements with which the Source is in Compliance?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 10
517.E.3 Additional Part 70 Requirements	Does the Certification Statement Include a Statement that the Source will, on a timely basis, meet All Applicable Requirements that will Become Effective During the Permit Term?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 10
517.E.4 Additional Part 70 Requirements	Are there Applicable Requirements for which the Source is not in Compliance at the Time of Submittal?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
	Does the Application include a Compliance Plan Schedule?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
	Does the Schedule Include Milestone Dates for which Significant Actions will occur?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
	Does the Schedule Include Submittal Dates for Certified Progress Reports?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.E.5 Additional Part 70 Requirements Acid Rain	Is this Source Covered by the Federal Acid Rain Program?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
	Are the Requirements of LAC 33:III.517.E 1-4 included in the Acid Rain Portion of the Compliance Plan?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	

PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit	Yes	No	N/A	Location Within the
517.E.6 Additional Part 70 Requirements	Have any Exemptions from any Applicable Requirements been Requested?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	No new exemption requests
	Is the List and explanations Provided?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.E.7 Additional Part 70 Requirements	Does the Application Include a Request for a Permit Shield?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	No new shields requested
	Does the Request List those Federally Applicable Requirements for which the Shield is Requested along with the Corresponding Draft Permit Terms and conditions which are Proposed to Maintain Compliance?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.E.8 Additional Part 70 Requirements	Does the Application Identify any Reasonably Anticipated Alternative Operating Scenarios?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
	Does the Application include Sufficient Information to Develop permit Terms and Conditions for Each Scenario, Including Source Process and Emissions Data?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.F Confidentiality	Does the Application Include a Request for Non-Disclosure (Confidentiality)?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
525.B. Minor Permit Modifications	Does the Application Include a Listing of New Requirements Resulting for the Change?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	No new requirements
	Does the Application Include Certification by the Responsible Official that the Proposed Action Fits the Definition of a Minor Modification as per LAC 33:III.525.A.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	cover letter
	Does the Certification also Request that Minor Modification Procedures be Used?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	cover letter
	Does the Application, for Part 70 Sources, Include the Owner's Suggested Draft Permit and Completed Forms for the Permitting Authority to Use to Notify Affected States?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
La. R.S. 30:2018 – PSD/NNSR only	Has a copy of the answers to the questions posed in the <u>Environmental Assessment Statement (Section 25)</u> been sent to	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
	Has a copy of the answers to the questions posed in the <u>Environmental Assessment Statement (Section 25)</u> been sent to the designated public library at no cost to the designated public	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	

Appendix A

Site Location Map



0 1,000 2,000 4,000
Feet

Site Location Map

East Baton Rouge Parish

Rhodia Inc.
Baton Rouge, Louisiana



PROVIDENCE

ENGINEERING & ENVIRONMENTAL GROUP LLC

Reference

Base map comprised of U.S.G.S. 7.5 minute topographic map, "Scotlandville, LA" dated 1963 revised 1994. Image is referenced to UTM NAD 83 Zone 15.

Doc. Code: 015-003

Drawn: LMH

Checked:

Dwg. No.: 015-003-A020

Approved:

Date: 02/02/05

1
Figure

Appendix B

Emission Calculations

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Cathy
EQ ID.: 301
Description: Phenolic Reactors Vent Scrubber C-209 (P&ID. F201)

Pollutant	Removal Efficiency (%)	Normal Operation ¹		Hot Water Flush ²		Outage ³	Overall Emissions		
		Emissions (lbs/hr)	Hrs/Yr	Emissions (lbs/hr)	Hrs/Yr		Average Hourly Emissions (lbs/hr)	Maximum Hourly Emissions (lbs/hr)	Annual Emissions (tpy)
Phenol	≥98	4.63E-05	8660	1.00	100	0.556	0.01	1	0.05
Pyrocatechol	≥99.9	4.63E-04	8660	0.10	100		0.00	0.1	0.007
Hydroquinone	≥53	6.53E-05	8660	0.01	100		0.000	0.01	0.001
Total VOC							0.01	1.1	0.06

Notes:

1 Based on stack testing conducted by ESE, June 1995. The maximum of the three test runs was used.

2 Estimate of emissions using 212F water in scrubber from Steve Levin, 4-19-2011, rounded up.

3 Scrubber Water Shut Off During Plant Outage; nitrogen sweep shut off:

Basis: Upon shutdown and nitrogen sweep being shut off, the vessels are allowed to cool down (contracting vapor, no emissions). Before startup, and at other times if needed, external heat may be applied to prevent freezing. Estimate emissions as follows:

Number of total heat-ups per year, (5 vessels, 10X each)	50
Temp increase per event	10 F
Phenol MW	94.113
Phenol freezing point	105.6 F
Assumed tank temp prior to heating	115.6 F
	575.6 R
	319.6 K
Vapor Pressure of Phenol at assumed temp	0.040 psia
Total pressure	14.7 psia
	1.00 atm
Mole fraction phenol, yi	0.00272
Vapor Space Volume	8000 gals
Universal Gas Constant, R	0.7302 atm·ft ³ /lbmole·R
Total moles in vapor space prior to heating	2.5446 lbmoles
Total moles phenol in vapor space prior to heating	0.0069 lbmoles
Vapor Expansion Factor	1.017
Phenol emitted per heat-up event	1.18E-04 lbmoles
	0.011 lbs
Total Emissions (assume all phenol)	0.556 lbs

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyal Plant

Unit: Cathy
EIQ I.D.: 302
Description: OSBL Tank Farm Scrubber C-319 (P&I.D. F107)

	Removal Efficiency (%)	Normal Operation ⁴			Hot Water Flush		Outage ⁵		Overall Emissions		
		Emissions (lbs/hr)	Basis	hrs/yr	Emissions (lbs/hr) ³	Hrs/Yr	Emissions (lbs/hr)	hrs/yr	Average Hourly Emissions (lbs/hr)	Maximum Hourly Emissions (lbs/hr)	Annual Emissions (tpy)
Phenol	≥98	3.17E-05	1	8660	0.01	100			0.0001	0.01	0.001
Isopropyl Ether	≥98	0.022	2	8420	13.5	100	0.97	240	0.202	13.50	0.88
Total VOC									0.202	13.51	0.88

Notes:

¹ Based on stack testing conducted by ESE, June 1995. The maximum of the three test runs was used.

² Based on stack testing conducted by G&M, Dec. 1996. The average emission rate is during R/C loading at normal scrubber flow rate.

³ For IPE, this is rate exiting condenser (normal inlet to scrubber) from design calcs Apx B. For phenol, estimate from Steve Levin 4-20-11, rounded up.

⁴ This scenario also includes a planned plant outage where nitrogen sweep is off, condenser is off, and scrubber is on. These emissions are less than normal as estimated below.

⁵ This scenario is a planned plant outage where nitrogen sweep is off, condenser is off, and scrubber is off. These emissions are greater than normal (as estimated below) and must be included in annual limit.

Calculate Breathing Losses During Plant Outage with Nitrogen Sweep Off⁶:

	D-315	D-107	D115
Tanks Program Inputs:			
contents	IPE	Water w/ trace IPE&Phenol ⁷	IPE
Type of Tank	Vertical	Vertical	Vertical
shell height (ft)	16	18	18
shell diameter (ft)	25	29	20
maximum liquid height (ft)	14.4	17.0	17.0
average liquid height (ft)	12.8	0.5	0.5
Volume (gals)	52,877	89,000	42,000
Turnovers per year	0	0	0
Net Throughput (gals/yr)	0	0	0
Is Tank Heated?	N	N	N
roof color/shade	white/white	white/white	white/white
roof condition	good	good	good
roof type (cone or dome)	cone	cone	cone
height of cone	0	0	0
slope of cone roof (ft/ft)	0.0625	0.0625	0.0625
shell color/shade ³	white/white	white/white	white/white
shell condition	good	good	good
vacuum settings (inches H ₂ O), this is N ₂ makeup se	1	1	1
pressure settings (inches H ₂ O), this is water depth in	10	10	10
vacuum settings (psig)	0.036	0.036	0.036
pressure settings (psig)	0.361	0.361	0.361
Tanks Program Outputs:			
Highest Monthly Emissions (June), lbs/mo	133.53	383.38	182.08
Additional Calcs:			
Pre-scrubber average lbs/hr (for note 5 outage)	0.19	0.53	0.25
Scrubber Efficiency	98%	98%	98%
Post-scrubber average lbs/hr (for note 4 outage)	0.004	0.011	0.005

⁶ Assume zero breathing loss from the phenol tanks due to decreasing or constant temperature.

⁷ Used 100% IPE as conservative estimate.

Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Cathyval Plant

Unit: Cathy
EQ I.D.: 304
Description: PC Flaker Vent Scrubber C-561 (P&I.D. F508)

	Removal Efficiency (%)	Normal Operation ³		Hot Water Flush		Overall Emissions		
		Emissions ¹ (lbs/hr)	Hrs/Yr	Emissions (lbs/hr) ²	Hrs/Yr	Average Hourly Emissions (lbs/hr)	Maximum Hourly Emissions (lbs/hr)	Annual Emissions (tpy)
Pyrocatechol	≥98	0.010	8744	0.300	100	0.013	0.300	0.059
Total VOC						0.013	0.300	0.059

Notes:

¹ Cathy Project Air Permit Data, Section 5, 3/6/90, outlet flow.

² Cathy Project Air Permit Data, Section 5, 3/6/90, inlet flow.

³ Includes a planned plant outage with the scrubber off. Emissions are less than or equal to normal emissions due to low vapor pressure materials. Scrubber will be back online before vessels are heated.

2100 V7
(2012)

**AIR, PESTICIDES, AND TOXICS
6TH FLOOR RECORDS CENTER
INFILE / NEW FILE FORM**

New file: ☐

or

Infiling: ☒

Choose from the file types below:

Air Facility

- ☐ AR- Acid Rain
- ☐ CB- Confidential Business
- ☐ CO- Compliance
- ☐ EN- ** Enforcement
- ☐ GE- General
- ☒ PE- Permit
- ☐ RA- Regulatory Applicability
- ☐ Other:

TSCA

- ☐ AH - Asbestos Hazard Emergency Response Act
- ☐ AS or AW - Asbestos or Asbestos Worker Prot.
- ☐ CB - Confidential
- ☐ SI - Site Specific
- ☐ FO - Non Site Specific
- ☐ IM - ** Section 5 * 8
- ☐ LB - ** Lead
- ☐ PC - **PCB

** Extension of File Type (if needed):

- ☐ ES - Enforcement Sensitive
- ☐ DP - Docket Number

☐ **EPCRA / SARA**

☐ **FIFRA**

Proj No:	14
LDEQ AI:	1314

Permit Type	Number
Minor Pmt No:	
PSD Pmt No:	
TV Pmt No:	0840-00033-V5
NNSR Pmt No:	
CAIR Pmt No:	
AR Pmt No:	

FRS Number: Company Name:

Site Name: Area Name:

Fac Street: Fac City:

Fac Cnty: Fac State: Fac Zip:

Requestor's Name:

Requestor's Phone:

Materials Sent To File Room

Application:

Format: Paper

Permit(s):



RECEIVED

12 OCT 10 AM 11:09

AIR PERMITS SECTION
6PD-R

September 7, 2012

Mr. Sanford Phillips, Assistant Secretary (**Hand Delivered**, original + 2 copies)
Louisiana Department of Environmental Quality
Office of Environmental Services; Air Permits Division
P.O. Box 4313
Baton Rouge, LA 70821-4313

EPA Region 6 (6PD-R) 7010 1670 0001 8962
1445 Ross Avenue, Ste. 1200
Dallas, TX 75202-2733

Subject: Application for **Minor Permit Modification to Part 70 Permit**
Sulfuric Acid Plant; Title V Permit No. 0840-0033-V4
Rhodia, Inc., Baton Rouge, LA ; Agency Interest No. 1314

Dear Mr. Phillips:

On March 15, 2012, LDEQ issued a Title V Permit Modification to Rhodia for the Sulfuric Acid Plant. Rhodia is requesting that minor permit modification procedures be used to reconcile emission rates and make other minor corrections/updates. The requested changes do not modify, remove, or add any federally-enforceable applicable requirements nor have any new federally-enforceable requirements become applicable since the last permit modification/renewal. A draft permit is not included (per LAC 33:III.525.B.2.c) because the requested changes are minor and the overall permit will remain largely unchanged.

LAC 33:III.525.B.2.b requires certification by responsible official that the proposed modification meets the criteria listed in LAC 33:III.525.A for a minor modification. By signature below, I certify that the proposed modification meets the criteria in LAC 33:III.525.A.2 for a minor modification.

If you have any questions or require any further information, please call John Richardson at 359-3768 or Julie Sheffield at 359-3432.

Sincerely,

Daniel Tate
Plant Manager

File 402.1.2

Department of Environmental Quality
Office of Environmental Services
Air Permits Division
P.O. Box 4313
Baton Rouge, LA 70821-4313
(225) 219-3181

LOUISIANA

Application for Approval of Emissions of Air Pollutants from Part 70 Sources



PLEASE TYPE OR PRINT

1. Facility Information [LAC 33:III.517.D.1]

Facility Name or Process Unit Name (if any) Sulfuric Acid Plant		<input type="checkbox"/> All Process Units <input checked="" type="checkbox"/> Process Unit-Specific Permit
Agency Interest Number (A.I. Number) 1314	Currently Effective Permit Number(s) 0840-00033-V4	
Company - Name of Owner Rhodia, Inc.		
Company - Name of Operator (if different from Owner) N/A		
Parent Company (if Company - Name of Owner given above is a division) The Solvay Group		

Ownership:

Check the appropriate box.

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> corporation, partnership, or sole proprietorship | <input type="checkbox"/> regulated utility | <input type="checkbox"/> municipal government |
| <input type="checkbox"/> state government | <input type="checkbox"/> federal government | <input type="checkbox"/> other, specify _____ |

2. Physical Location and Process Description

[LAC 33:III.517.D.18, unless otherwise stated]

What does this facility produce? Add more rows as necessary

Sulfuric Acid

What modifications/changes are proposed in this application? Add more rows as necessary.

see next page

Nearest town (in the same parish as the facility):

Parish(es) where facility is located:

Baton Rouge			East Baton Rouge					
Distance To (mi):	~222	Texas	~269	Arkansas	~129	Mississippi	~262	Alabama
Latitude Front Gate:	30	Deg	30	Min	30	Sec	30	Hundredths
Longitude Front Gate:	-91	Deg	11	Min	16	Sec	58	Hundredths
Distance from nearest Class I Area	225	Kilometers						

Add physical address and description of location of the facility below. If the facility has no address, provide driving directions. Add more rows as necessary.

1275 Airline Highway, Baton Rouge, LA 70805. Rhodia is located immediately north of Highway 190 along the east bank of the Mississippi River.

- ☒ Map attached (required per LAC 33:III.517.D.1)
- ☐ Description of processes and products attached (required per LAC 33:III.517.D.2) NOTE: no change from current permit
- ☒ Introduction/Description of the proposed project attached (required per LAC 33:III.517.D.5)

Modifications Addressed in Permit Application Forms:

- The sulfur feed tank (EIQ 20, EQT 0146) emissions are being reconciled to incorporate test results from February 2012. A report was submitted to LDEQ dated March 29, 2012. Hydrogen sulfide (class III TAP) emissions are being increased to above its MER. See Appendix C for Chapter 51 discussion.
- In March 2013, the Unit 1 Pre-heater stack (EIQ 10, EQT 0140) and the heat exchanger associated with the pre-heater will be replaced. The pre-heater furnace itself will not be replaced. An EIQ form is included to modify the stack physical characteristics. The SO₂ emissions are also being reconciled to use the AP-42 factor instead of sulfur content of natural gas (unrelated to heat exchanger project).
- PM₁₀ and NO_x emissions for the Acid Plant Vapor Combustor (APVC, EIQ 27, EQT 0151) are being reconciled using new natural gas usage data from a recently-installed natural gas meter.
- Stack discharge characteristics for the TS Vapor Combustor (TSVC, EIQ 21, EQT 0147) and Acid Plant Vapor Combustor (APVC, EIQ 27, EQT 0151) are being updated based upon recent testing.
- Per the condensable PM policy, EIQ forms for sources that emit sulfuric acid (EIQ 12 - Oleum Loading Vent Scrubber, EIQ 24 - Oleum Barge Loading Scrubber, and Fug-Acid - Acid Plant Fugitive Emissions) have been modified to include PM₁₀ as a pollutant. Note that condensable PM was addressed in a previous permit modification for Unit 1 and Unit 2 (sources RLP 0014, RLP 0013, CAP-SAU). Stack gas characteristics are also being updated for EIQ 24.
- Minor reconciliation of GC XVII emissions, including adding PM₁₀ as a pollutant for activities that emit sulfuric acid.

Other Modifications/Corrections:

- Based on testing conducted in June 2012 on the Caustic Scrubber (EIQ 13, EQT 0277; report was submitted to LDEQ on 8/3/12):
 - Rhodia requests that the minimum pH per SR #38 be changed from 7 to 6
 - Rhodia requests that the averaging basis for pH and flow rate per SR #s 38 and 41 be changed from a 4-hour average to a 1-hour average
 - SR #s 37 and 39 are the associated monitoring requirements and they should have "none specified" or "1-hour average" for the Statistical Basis
- Remove the outdated phase II emissions from the Emission Rate Tables
- Remove the outdated/completed SR #s 227, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 278, 279
- Note that SR #s 189 and 199 are redundant, please retain only #199
- Permit V4 added the ABCO boiler to CAP-Comb but neglected to increase the SO₂ emission rate in the Emission Rate Table. The emission rate (phase III) should be 1076.13 tpy
- On page 6 of 7 in the Inventory, Subject Item Groups, GRP 0021, the Group Description should include the Package (ABCO) boiler since permit V4 added that boiler to the group
- Per a meeting with LDEQ on 6/19/12 and subsequent discussion with Bryan Johnston on 8/20/12, Rhodia requests that SR# 362 be replaced with 2 new SRs as follows. Appendix B includes additional information about the individual and total TAP/HAP emission limits.
 - "The total emissions of all pollutants listed for Process Group Spt-Proc (PCS 0001) in the table "Emission Rates for TAP/HAP & Other Pollutants" shall not exceed 0.56 tons/year. These emissions shall be calculated and recorded annually, both for each individual pollutant and the sum. These records shall be kept onsite and available for inspection by the Office of Environmental Compliance, Surveillance Division. Emissions greater than 0.56 tons/year for the sum of Spt-Proc pollutants in any calendar year shall be a violation of this permit and must be reported to the Office of Environmental Compliance, Enforcement Division."
 - "The total emissions of all pollutants listed for Process Group TS-Proc (PCS 0002) in the table "Emission Rates for TAP/HAP & Other Pollutants" shall not exceed 2.02 tons/year. These emissions shall be calculated and recorded annually, both for each individual pollutant and the sum. These records shall be kept onsite and available for inspection by the Office of Environmental Compliance, Surveillance Division. Emissions greater than 2.02 tons/year for the sum of TS-Proc pollutants in any calendar year shall be a violation of this permit and must be reported to the Office of Environmental Compliance, Enforcement Division."
- Remove pollutant "Toxic Air Pollutants" from the Emission Rates Table for process groups Spt-Proc and TS-Proc. This is unnecessary with the addition of the 2 new SRs above.

3. Confidentiality [LAC 33.I.Chapter 5]

Are you requesting confidentiality for any information except air pollutant emission rates ?

☐ Yes ☒ No

If "yes," list the sections for which confidentiality is requested below. Add rows as necessary. Confidentiality requests require a submittal that is separate from this application. Information for which confidentiality is requested should not be submitted with this application. Consult instructions.

4. Type of Application [LAC 33:III.517.D]

Complete the appropriate column (1 or 2) that corresponds to the type of permit being sought. Check all that apply within the appropriate column.

Column 1	Column 2
<input type="checkbox"/> Part 70 General	<input checked="" type="checkbox"/> Part 70 Regular
<input type="checkbox"/> Renewal	<input type="checkbox"/> Renewal
Select one, if applicable: <input type="checkbox"/> Entirely new facility <input type="checkbox"/> Modification or expansion of existing facility (may also include reconciliations) <input type="checkbox"/> Reconciliation only <input type="checkbox"/> Individual emissions unit(s) addition	Select one, if applicable: <input type="checkbox"/> Entirely new facility <input type="checkbox"/> Significant modification or expansion of existing facility (may also include reconciliations) [LAC 33:III.527] <input type="checkbox"/> Minor modification or expansion of existing facility (may also include reconciliations) [LAC 33:III.525] <input checked="" type="checkbox"/> Reconciliation only NSR Analysis: <input type="checkbox"/> PSD <input type="checkbox"/> NNSR

Does this submittal update or replace an application currently under review?

☐ Yes ☒ No

If yes, provide date that the prior application was submitted:

Select one if this application is for an existing facility that does not have an air quality permit:

- ☐ Previously Grandfathered (LAC 33:III.501.B.6)
☐ Previously Exempted (e.g., Small Source Exemption; LAC 33:III.501.B.2.d)
☐ Previously Unpermitted

5. Fee Information [LAC 33:III.517.D.17]

Fee Parameter: If the fee code is based on an operational parameter (such as number of employees or capital cost), enter that parameter here. per ton daily rate capacity

Industrial Category: Enter the Standard Industrial Classification (SIC) and North American Industry Classification (NAICS) Codes that apply to the facility.

Primary SICC: 2819 **NAICS Code:** 325188

Secondary SICC(s): N/A

Project Fee Calculation: Enter fee code, permit type, production capacity/throughput, and fee amount pursuant to LAC 33:III.Chapter 2. Add rows to this table as needed. Include with the application the amount in the Grand Total blank as the permit application fee.

FEE CODE	TYPE	EXISTING CAPACITY	INCREMENTAL CAPACITY INCREASE	SURCHARGES				TOTAL AMOUNT
				MULTIPLIER	NSPS	PSD	AIR TOXICS	
0540	minor				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ 1,556.00
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
GRAND TOTAL								\$ 1,556.00

****Optional** Fee Explanation:** Use the space provided to give an explanation of the fee determination displayed above. Using this area will help to avoid confusion.

Minimum minor mod fee applies per LAC 33:III.211.B.13.d. Emissions are being reconciled only.

Electronic Fund Transfer (EFT): If paying the permit application fee using an Electronic Fund Transfer (EFT), please include the EFT Transaction Number, the Date that the EFT was made, and the total dollar amount submitted in the EFT. If not paying the permit application fee using EFT, leave blank.

EFT Transaction Number

Date of Submittal

Total Dollar Amount

\$

6. Key Dates

Estimated date construction will commence: _____ Estimated date operation will commence: _____

7. Pending Permit Applications – For Process Unit-Specific Permits Only

[LAC 33:III.517.D.18]

List all other process units at this facility for which Part 70 permit applications have been submitted, but have not been acted upon by LDEQ as of the date of submittal of this application. If none, state "none" in the table. ****It is not necessary to update this table during the permit review process, unless requested by LDEQ.****

Process Unit Name	Permit Number	Date Submitted
none		

8. LAC 33:I.1701 Requirements – Answer all below for new sources and permit renewals -

☐ Yes ☐ No

Does the company or owner have federal or state environmental permits identical to, or of a similar nature to, the permit for which you are applying in Louisiana or other states? (This requirement applies to all individuals, partnerships, corporations, or other entities who own a controlling interest of 50% or more in your company, or who participate in the environmental management of the facility for an entity applying for the permit or an ownership interest in the permit.)

☐ Yes ☐ No

If yes, list States: _____

Do you owe any outstanding fees or final penalties to the Department?

☐ Yes ☐ No

If yes, explain below. Add rows if necessary.

Is your company a corporation or limited liability company? ☐ Yes ☐ No

If yes, attach a copy of your company's Certificate of Registration and/or Certificate of Good Standing from the Secretary of State. The appropriate certificate(s) should be attached to the end of this application as an appendix.

9. Permit Shield Request [LAC 33:III.517.E.7] ☐ Yes ☒ No no new shields being requested

If yes, check the appropriate boxes to indicate the type of permit shield being sought. Include the specific regulatory citation(s) for which the shield is being requested. Give an explanation of the circumstances that will justify the permit shield request. Attach additional pages if necessary. If additional pages are used, attach them directly behind this page and enter "See Attached Pages" into the Explanation field.

Type of Permit Shield request (check all that apply):

Non-applicability determination for:	Specific Citation(s)	Explanation
<input type="checkbox"/> 40 CFR 60		
<input type="checkbox"/> 40 CFR 61		
<input type="checkbox"/> 40 CFR 63		
<input type="checkbox"/> Prevention of Significant Deterioration		
<input type="checkbox"/> Nonattainment New Source Review		


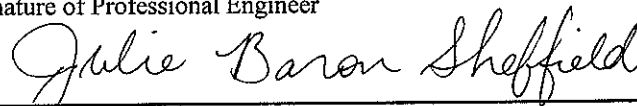
Interpretation of monitoring, recordkeeping, and/or reporting requirements, and/or means of compliance for:	Specific Citation(s)	Explanation
<input type="checkbox"/> 40 CFR 60		
<input type="checkbox"/> 40 CFR 61		
<input type="checkbox"/> 40 CFR 63		
<input type="checkbox"/> Prevention of Significant Deterioration		
<input type="checkbox"/> Nonattainment New Source Review		
<input type="checkbox"/> State Implementation Plan (SIP)) Regulation(s) referenced in 40 CFR 52 Subpart T		

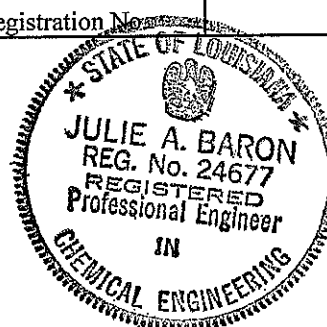
10. Certification of Compliance with Applicable Requirements

Statement for Applicable Requirements for Which the Company and Facility Referenced In This Application Is In Compliance

Based on information and belief, formed after reasonable inquiry, the company and facility referenced in this application is in compliance with and will continue to comply with all applicable requirements pertaining to the sources covered by the permit application, as outlined in Tables 1 and 2 in the permit application. For requirements promulgated as of the date of this certification with compliance dates effective during the permit term, I further certify that the company and facility referenced in this application will comply with such requirements on a timely basis and will continue to comply with such requirements.

For corporations only: By signing this form, I certify that, in accordance with the definition of Responsible Official found in LAC 33:III.502, (1) I am a president, secretary, treasurer, or vice-president in charge of a principal business function, or other person who performs similar policy or decision-making functions; or (2) I am a duly authorized representative of such person; am responsible for the overall operation of one or more manufacturing, production, or operating facilities addressed in this permit application; and either the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars); or the delegation of authority has been approved by LDEQ prior to this certification.*

CERTIFICATION: I certify, under provisions in Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information contained in this Application for Approval of Emissions of Air Pollutants from Part 70 Sources, including all attachments thereto and the compliance statement above, are true, accurate, and complete.			CERTIFICATION: I certify that the engineering calculations, drawings, and design are true and accurate to the best of my knowledge.		
a. Responsible Official			b. Professional Engineer		
Name Daniel Tate			Name Julie Baron Sheffield		
Title Plant Manager			Title Environmental Consultant		
Company Rhodia, Inc.			Company JBS, L.L.C.		
Suite, mail drop, or division			Suite, mail drop, or division		
Street or P.O. Box PO Box 828			Street or P.O. Box PO Box 828		
City Baton Rouge	State LA	Zip 70821	City Baton Rouge	State LA	Zip 70821
Business phone (225) 359-3751			Business phone (225) 359-3432		
Email Address Daniel.Tate@US.RHODIA.com			Email Address Julie.Sheffield@US.RHODIA.com		
Signature of responsible official (See 40 CFR 70.2) 			Signature of Professional Engineer 		
Date 8/13/12			Date 9-5-12		
*Approval of a delegation of authority can be requested by completing a Duly Authorized Representative Designation Form (Form 7218) available on LDEQ's website at http://www.deq.louisiana.gov/portal/tabid/2758/Default.aspx			Louisiana Registration No. 24677		



11. Personnel [LAC 33:III.517.D.1]

a. Manager of Facility who is located at plant site			b. On-site contact regarding air pollution control		
Name <input type="checkbox"/> Primary Contact Daniel Tate			Name <input type="checkbox"/> Primary Contact John Richardson		
Title Plant Manager			Title Environmental Manager		
Company Rhodia, Inc.			Company Rhodia, Inc.		
Suite, mail drop, or division			Suite, mail drop, or division		
Street or P.O. Box PO Box 828			Street or P.O. Box PO Box 828		
City Baton Rouge	State LA	Zip 70821	City Baton Rouge	State LA	Zip 70821
Business phone (225) 359-3751			Business phone (225) 359-3768		
Email Address <u>Daniel.Tate@US.RHODIA.com</u>			Email Address <u>John.Richardson@US.RHODIA.com</u>		

c. Person to contact with written correspondence			d. Person who prepared this report		
Name <input checked="" type="checkbox"/> Primary Contact John Richardson			Name <input type="checkbox"/> Primary Contact Julie Sheffield		
Title Environmental Manager			Title Environmental Consultant		
Company Rhodia, Inc.			Company JBS, LLC		
Suite, mail drop, or division			Suite, mail drop, or division		
Street or P.O. Box PO Box 828			Street or P.O. Box PO Box 828		
City Baton Rouge	State LA	Zip 70821	City Baton Rouge	State LA	Zip 70821
Business phone (225) 359-3768			Business phone (225) 359-3432		
Email Address <u>John.Richardson@US.RHODIA.com</u>			Email Address <u>Julie.Sheffield@US.RHODIA.com</u>		

e. Person to contact about Annual Maintenance Fees		
Name John Richardson		
Title Environmental Manager		
Company Rhodia, Inc.		
Suite, mail drop, or division		
Street or P.O. Box PO Box 828		
City Baton Rouge	State LA	Zip 70821
Business phone (225) 359-3768		
Email Address <u>John.Richardson@US.RHODIA.com</u>		

12. Proposed Project Emissions [LAC 33:III.517.D.3]

List the total emissions following the proposed project for this facility or process unit (for process unit-specific permits). Speciate all criteria pollutants, TAP, and HAP for the proposed project.

Pollutant	Proposed Emission Rate (tons/yr)
<i>The pollutants being modified are listed below. Other pollutants will remain at currently permitted rates and, for brevity, are not listed below.</i>	
PM ₁₀	58.95
SO ₂	1077.96
NOx	118.64
CO	103.81
VOC Total	29.87
Total HAPs	9.41
Total TAPs	52.60
Hydrogen sulfide	2.21
Carbon Disulfide	0.91
Carbonyl Sulfide	0.49

13. History of Permitted Emissions [LAC 33:III.517.D.18]

List each of the following in chronological order:

- The Permit Number and Date Action Issued for each air quality permit that has been issued to this facility or process unit (for process unit-specific permits) within the last ten (10) years.

- All small source exemptions, authorizations to construct, administrative amendments, case-by-case insignificant activities, and changes of tank service that have been approved since the currently effective Title V Operating Permit or State Operating Permit was issued to this facility or process unit (for process unit-specific permits). It is not necessary to list any such activities issued prior to the issuance of the currently effective Title V Operating Permit or State Operating Permit, if one exists.

Permit Number	Date Action Issued
0840-00033-V0	October 12, 2005
0840-00033-V1	March 14, 2007
0840-00033-V2	November 30, 2009
0840-00033-V3	May 11, 2011
0840-00033-V4	March 15, 2012

14.a. Enforcement Actions [LAC 33:III.517.D.18] -

☐ Yes ☒ No

If yes, list all federal and state air quality enforcement actions, settlement agreements, and consent decrees received for this facility and/or process unit (for process unit-specific permits) since the issuance of the currently effective Title V Operating Permit or State Operating Permit. For each action, list the type of action (or its tracking number), the regulatory authority or authorities that issued the action, and the date that the action was issued. Summarize the conditions imposed by the enforcement action, settlement agreement, and consent decree in Section 23, Table 2. It is not necessary to submit a copy of the referenced action. Add rows to table as necessary.

Type of Action or Tracking Number	Issuing Authority	Date Action Issued	Summary of Conditions Included?
			<input type="checkbox"/> Yes <input type="checkbox"/> No

14.b. Schedule for Compliance [LAC 33:III.517.E.4]☐ Yes ☒ No

If the facility or process unit for which application is being made is not in full compliance with all applicable regulations, give a description of how compliance will be achieved, including a schedule for compliance below. Add rows as necessary. See instructions.

15. Letters of Approval for Alternate Methods of Compliance -☐ Yes ☒ No

If yes, list all correspondence with LDEQ, EPA, or other regulatory bodies that provides for or supports a request for alternate methods of compliance with any applicable regulations for this facility or process unit (for process unit-specific permits). List the date of issuance of the letter and the regulation referenced by the letter. **Attach as an appendix a copy of all documents referenced in this table.** Letters that are not included may not be incorporated into a final permit. Add rows to table as necessary.

Date Letter Issued	Issuing Authority	Referenced Regulation(s)	Copy of Letter Attached?
			<input type="checkbox"/> Yes <input type="checkbox"/> No
			<input type="checkbox"/> Yes <input type="checkbox"/> No

16. Initial Notifications and Performance Tests [LAC 33:III.517.E.1]☒ Yes ☐ No

If yes, list any initial notifications that have been submitted or one-time performance tests that have been performed for this facility or process unit (for process unit-specific permits) since the issuance of the currently effective Title V Operating Permit or State Operating Permit in order to satisfy regulatory requirements. Any initial notification or one-time performance test requirements that have not been satisfied should be listed in Section 23, Table 2 of this application. Any notifications or performance tests that recur periodically should also be properly noted in Section 23, Table 2 of this application. Add rows to table as necessary.

Initial Notification or One-time Performance Test?	Regulatory Citation Satisfied	Applicable Source(s)	Date Completed/Approved
Initial SO ₂ and Opacity Performance Test	40 CFR 60.8 and 60.85(b); Civil Action No. 2: 07-CV-134-WCL; SR#227	Unit No. 1, RLP 014	completed June 4-5, 2012
SO ₂ CEMS Initial Performance Evaluation	40 CFR 60.84(a) and 60.13(c)	Unit No. 1, RLP 014	completed June 4-5, 2012

17. Existing Prevention of Significant Deterioration or Nonattainment New Source Review Limitations [LAC 33:III.517.D.18]

Do one or more emissions sources represented in this permit application currently operate under one or more NSR permits?

☐ Yes ☒ No

If "yes," summarize the limitations from such permit(s) in the following table. Add rows to table as necessary. Be sure to note any annual emissions limitations from such permit(s) in Sections 13 and 14 of this application.

Permit Number	Date Issued	Emission Point ID No.	Pollutant	BACT/LAER Limit ¹	Averaging Period	Description of Control Technology/Work Practice Standards

¹For example, lb/MM Btu, ppmvd @ 15% O₂, lb/ton, lb/hr

18. Air Quality Dispersion Modeling [LAC 33:III.517.D.15]

Was Air Quality Dispersion Modeling as required by LAC 33:III performed in support of this permit application? (Air Quality Dispersion Modeling is only required when applying for PSD permits and as requested by LDEQ.)

☐ Yes ☒ No

Has Air Quality Dispersion Modeling completed in accordance with LAC 33:III ever been performed for this facility in support of a air permit application previously submitted for this facility or process unit (for process unit-specific permits) or as required by other regulations AND approved by LDEQ?

☒ Yes ☐ No

If yes, enter the date the most recent Air Quality Dispersion Modeling results as required by LAC 33:III were submitted:

For sulfuric acid: 10/6/2008; for TAP metals: May 2009; for other TAPs: March 2005; for SO₂, approximately August 2004. The sulfuric acid modeling was submitted as part of a permit application because initial analysis indicated a PSD major modification. Analysis was later revised and the PSD application was withdrawn.

If the answer to either question above is "yes," enter a summary of the most recent results in the following table. If the answer to both questions is "no," enter "none" in the table. Add rows to table as necessary.

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Standard or (National Ambient Air Quality Standard {NAAQS})
Sulfuric Acid	8-hour	22.32 µg/m ³	23.8 µg/m ³
SO ₂ Phase I emission rates (no longer in effect)	annual	21.88 µg/m ³	80 µg/m ³
	24-hour	335.04 µg/m ³	365 µg/m ³
	3-hour	1017.57 µg/m ³	1300 µg/m ³
Antimony (and compounds)	8-hour	0.46624 µg/m ³	11.9 µg/m ³
Arsenic (and compounds)	annual	0.00004 µg/m ³	0.02 µg/m ³
Barium (and compounds)	8-hour	0.88404 µg/m ³	11.9 µg/m ³
Chromium VI (and compounds)	annual	0.00004 µg/m ³	0.01 µg/m ³
Copper (and compounds)	8-hour	0.40913 µg/m ³	23.8 µg/m ³
Manganese (and compounds)	8-hour	0.27827 µg/m ³	4.76 µg/m ³
Nickel (and compounds)	annual	0.00004 µg/m ³	0.21 µg/m ³
Selenium (and compounds)	8-hour	0.35001 µg/m ³	4.76 µg/m ³
Zinc (and compounds)	8-hour	0.80561 µg/m ³	119 µg/m ³
MIBK	8-hour	323 µg/m ³	4880 µg/m ³
Dichloromethane	annual	0.86668 µg/m ³	212.77 µg/m ³
Acrylonitrile	annual	1.152 µg/m ³	1.47 µg/m ³
1,3-Butadiene	annual	0.723 µg/m ³	0.92 µg/m ³
Chlorine	8-hour	18.95 µg/m ³ *	35.7 µg/m ³
Hydrochloric acid	8-hour	79.75 µg/m ³ *	180 µg/m ³
Hydrogen Sulfide	8-hour	264.82 µg/m ³ *	330 µg/m ³

* Internal modeling studies conducted by Rhodia to assess impact of increased (reconciled) emission rates. Results available to LDEQ upon request.

19. General Condition XVII Activities -

■ Yes □ No

Enter all activities that qualify as Louisiana Air Emissions Permit General Condition XVII Activities.

- Expand this table as necessary to include all such activities.
- See instructions to determine what qualifies as a General Condition XVII Activity.
- Do not include emissions from General Condition XVII Activities in the proposed emissions totals for the permit application.

ID No.	Work Activity	Schedule	Emission Rates – TPY					
			PM ₁₀	SO ₂	NO _x	CO	VOC	Other
Note: Edits from current GCXVII List shaded gray.								
GC 1	Catalyst reconditioned in Sulfuric Acid Unit Nos. 1 & 2	Once each 12 months per unit	0.2					
GC 2	Drum re-packaging	4 times per year					0.002	
GC 3	Vacuum trucks used for tank cleanouts, spill cleanup, and sump clean out	Weekly		0.06			0.06	
GC 4	Tank and process equipment cleaning			0.1			0.90	
GC 5	Opening of trucks and railcars containing waste fuel and spent acid for sampling, inspection, maintenance, or further processing	Daily		0.5			0.1	
GC 6	Sampling waste fuel trucks, railcars, and tanks via sample tap	10 times per day					0.03	##
GC 7	Sampling spent acid and IFS trucks, railcars, and barges	8 times per day		0.004			0.004	
GC 8	Washing inside surface of Unit 1 exhaust stack	2 times per year	0.01*		0.25			0.01*
GC 9	Odor-neutralizing compounds						0.06	
GC 10	Manual gauging of tank levels			0.5			0.1	
GC 11	Melting sulfur solidified in piping and other equipment at the old sulfur pit (former EIQ ID 18)			<0.001				<0.001#
GC 12	Sampling for moisture content, stack gauging, and pressure readings from gas streams		0.1*	0.1				0.1*
GC 13	Loading fresh acid onto heel of spent acid			0.003			0.004	
GC 14	Maintenance that requires shutdown or bypass of Acid Plant Vapor Combustor (APVC)	240 hrs per year (max)					4.62	**
GC 15	Unloading containers of spent acid with chlorinated VOCs (carbon bed for VOCs, caustic scrubber if any SO2 present)	1 per week		0.1			0.06	**

* Sulfuric Acid Mist

Hydrogen Sulfide

** Speciated VOCs covered by Spent Acid Process permitted emissions

Speciated VOCs covered by TS Process permitted emissions

20. Insignificant Activities [LAC 33:III.501.B.5]

■ Yes □ No

Enter all activities that qualify as Insignificant Activities.

- Expand this table as necessary to include all such activities.
- For sources claimed to be insignificant based on size or emission rate (LAC 33:III.501.B.5.A), information must be supplied to verify each claim. This may include but is not limited to operating hours, volumes, and heat input ratings.
- If aggregate emissions from all similar pieces of equipment (i.e. all LAC 33:III.501.B.5.A.1 activities) claimed to be insignificant are greater than 5 tons per year for any pollutant, then the activities can not be claimed as insignificant and must be represented as permitted emission sources. Consult instructions.

Emission Point ID No.	Description	Physical/Operating Data	Citation
<i>Note: Edits from current IA list are shaded gray.</i>			
20D962	Diesel Storage Tank, Firewater Pump	300 gals	LAC 33: III.501.B5.A.3
90D360	Diesel Storage Tank, Maintenance	1000 gals	LAC 33: III.501.B5.A.3
None	Diesel Storage Tank, IFS	1000 gals	LAC 33: III.501.B5.A.3
91D321	IFS Wash-water Storage Tank	9000 gals	LAC 33: III.501.B5.A.3
90D210	Laboratory Excess Sample Tank	100 gals	LAC 33: III.501.B5.A.2
Hoods	Different Analyses*	N/A	LAC 33: III.501.B5.A.6
	Drum Washing Operations	55 gals	LAC 33: III.501.B5.A.7
None	Temporary (Seasonal) Portable Gasoline Tank	550 gals	LAC 33: III.501.B5.A.8

* Vents associated with exhaust hoods for laboratory equipment used exclusively for routine chemical and physical analysis with the purpose of quality control or environmental monitoring purposes.

21. Regulatory Applicability for Commonly Applicable Regulations – Answer all below [LAC 33:III.517.D.10]

Does this facility contain asbestos or asbestos containing materials?

■ Yes □ No

If “yes,” the facility or any portion thereof may be subject to 40 CFR 61, Subpart M, LAC 33:III.Chapter 27, and/or LAC 33:III.5151 and this application must address compliance as stated in Section 23 of this application.

Is the facility or process unit represented in this permit subject to 40 CFR 68, or is any other process unit located at same facility as the process unit represented in this application subject to 40 CFR 68?

■ Yes □ No

If “yes,” the entire facility is subject to 40 CFR 68 and LAC 33:III.Chapter 59 and this application must address compliance as stated in Section 23 of this application.

Is the facility listed in LAC 33:III.5611

Table 5 ■ Yes □ No

Table 6 ■ Yes □ No

Table 7 ■ Yes □ No

Does the applicant own or operate commercial refrigeration equipment normally containing more than 50 pounds of refrigerant at this facility or process unit?

■ Yes □ No

If “yes,” the entire facility is subject to 40 CFR 82, Subpart F and this application must address compliance as stated in Section 23 of this application.

22. Applicable Regulations, Air Pollution Control Measures, Monitoring, and Recordkeeping

Important points for Table 1 [LAC 33:III.517.D.10]:

- List in Table 1, by Emission Point ID Number and Descriptive Name of the Equipment, state and federal pollution abatement programs and note the applicability or non-applicability of the regulations to each source.
- Adjust the headings for the columns in Table 1 as necessary to reflect all applicable regulations, in addition to any regulations that do not apply but need an applicability determination to verify this fact.
- For each piece of equipment, enter "1" for each regulation that applies. Enter "2" for each regulation that applies to this type of source, but from which this source of emissions is exempt. Enter "3" for equipment that is subject to a regulation, but does not have any applicable requirements. Also, enter "3" for each regulation that have applicable requirements that apply to the particular emission
- Leave the spaces blank when the regulations clearly would not apply under any circumstances to the source. For example, LAC 33:III.2103 – Storage of Volatile Organic Compounds would never apply to a steam generating boiler, no matter the circumstances.
- Consult instructions.

Important points for Table 2 [LAC 33:III.517.D.4; LAC 33:III.517.D.7; LAC 33:III.517.D.10]:

- For each piece of equipment listed in Table 2, include all applicable limitation, recordkeeping, reporting, monitoring, and testing requirements. Also include any one-time notification or one-time tests performance test requirements that have not been fulfilled.
- Each of these regulatory aspects (limitation, recordkeeping, reporting, etc.) should be addressed for each regulation that is applicable to each emissions source or emissions point.
- For each regulation that provides a choice regarding the method of compliance, indicate the method of compliance that will be employed. It is not sufficient to state that all compliance options will be employed, though multiple compliance options may be approved as alternative operating scenarios.
- Consult instructions.

Important points for Table 3 [LAC 33:III.517.D.16]:

- Each time a 2 or a 3 is used to describe applicability of a source in Table 1, an entry should be made in Table 3 that explains the exemption or non-applicability status of the regulation to that source.
- Fill in all requested information in the table.
- The exact regulatory citation that provides for the specific exemption or non-applicability determination should be entered into the Citation Providing for Exemption or Non-applicability column.
- Consult Instructions.

Important points for Table 4 [LAC 33:III.517.D.18]

- List any single emission source that routes its emissions to another point where these emissions are commingled with the emissions of other sources before being released to the atmosphere. Do not list any single emission source in this table that does not route its emissions in this manner.
- List any and all emission sources that are routed as described above. This includes emission sources that do not otherwise appear in this permit application.
- Consult instructions.

23. Emissions Inventory Questionnaire (EIQ) Forms [LAC 33:III.517.D.3; 517.D.6]

Complete one (1) EIQ for:

- Each emission source. If two emission sources have a common stack, the applicant may submit one EIQ sheet for the common emissions point. Note any emissions sources that route to this common point in Table 4 of the application.
- Each emissions CAP that is proposed. In general, this applies to each source that is part of the CAP.
- Each alternate operating scenario that a source may operate under. Some common scenarios are:
 1. Sources that combust multiple fuels
 2. Sources that have Startup/Shutdown max lb/hr emission rates higher than the max lb/hr for normal operating conditions would need an EIQ for the Startup/Shutdown emission rates for those sources
- Fugitive emissions releases. One (1) EIQ should be completed for each of the following types of fugitive emissions sources or
 1. Equipment leaks.
 2. Non-equipment leaks (i.e. road dust, settling ponds, etc).

For each EIQ:

- Fill in all requested information.
- Speciate all Toxic Air Pollutants and Hazardous Air Pollutants emitted by the source.
- Use appropriate significant figures.
- Consult instructions.

The EIQ is in Microsoft Word Excel. Click on this link to get to the EIQ form.

<http://www.deq.louisiana.gov/portal/DIVISIONS/AirPermits/AirPermitApplications.aspx>

24. NSR Applicability Summary [LAC 33:III.504 and LAC 33:III.509]

■ N/A

This section consists of five tables, A-E, and is applicable only to new and existing major stationary sources (as defined in LAC 33:III.504 or in LAC 33:III.509) proposing to permit a physical change or change in the method of operation. It would also apply to existing minor stationary sources proposing a physical change or change in the method of operation where the change would be a major source in and of itself. Add rows to each table as necessary. Provide a written explanation of the information summarized in these tables. Consult instructions.

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

Instructions: Complete this checklist and submit with the completed air permit application.

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit Application	Yes	No	NA	Location Within the Permit Application
517.A Timely Submittal	Was a Copy of the Application Also Submitted to EPA?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	
517.B.1,2 Certification	Does the Application include a Certification by a Responsible Official?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 10
517.B.3 Certification	Does the Application Include Certification by a Professional Engineer or their Designee:	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 10
517.D.1 Identifying Information	Does the Application Include:				
	1. Company Name, Physical and Mailing Address of Facility?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 2
	2. Map showing Location of the Facility?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Appendix A
	3. Owner and Operator Names and Agent?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 1
	4. Name and Telephone Number of Plant Manager or Contact?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 11
517.D.2 SIC Codes, Source Categories	Does the Application Include a Description of the Source's Processes and Products?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	No change from current permit
	Does the Application Include the Source's SIC Code?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 5
	Does the Application Include EPA Source Category of HAPs if applicable?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.D.3,6 EIQ Sheets	Has an EIQ Sheet been Completed for each Emission Point whether an Area or Point Source?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 24
517.D.4 Monitoring Devices	Does the Application Include Identification and Description of Compliance Monitoring Devices or Activities?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	No change from current permit
517.D.5 Revisions and Modifications Only	For Revisions or Modifications, Does the Application include a Description of the Proposed Change and any Resulting Change in Emissions?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Sections 2, 12, 24
517.D.7 General Information	Does the Application Include Information Regarding Fuels, Fuel Use, Raw Materials, Production Rates, and Operating Schedules as necessary to substantiate emission rates?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Appendix B
517.D.8 Operating Limitations	Has Information Regarding any Limitations on Source Operation or any Applicable Work Practice Standards been Identified?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	No change from current permit
517.D.9 Calculations	Are Emission Calculations Provided?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Appendix B
517.D.10 Regulatory Review	Does the Application Include a Citation and Description of Applicable Louisiana and Federal Air Quality Requirements and Standards?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	No change from current permit

PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

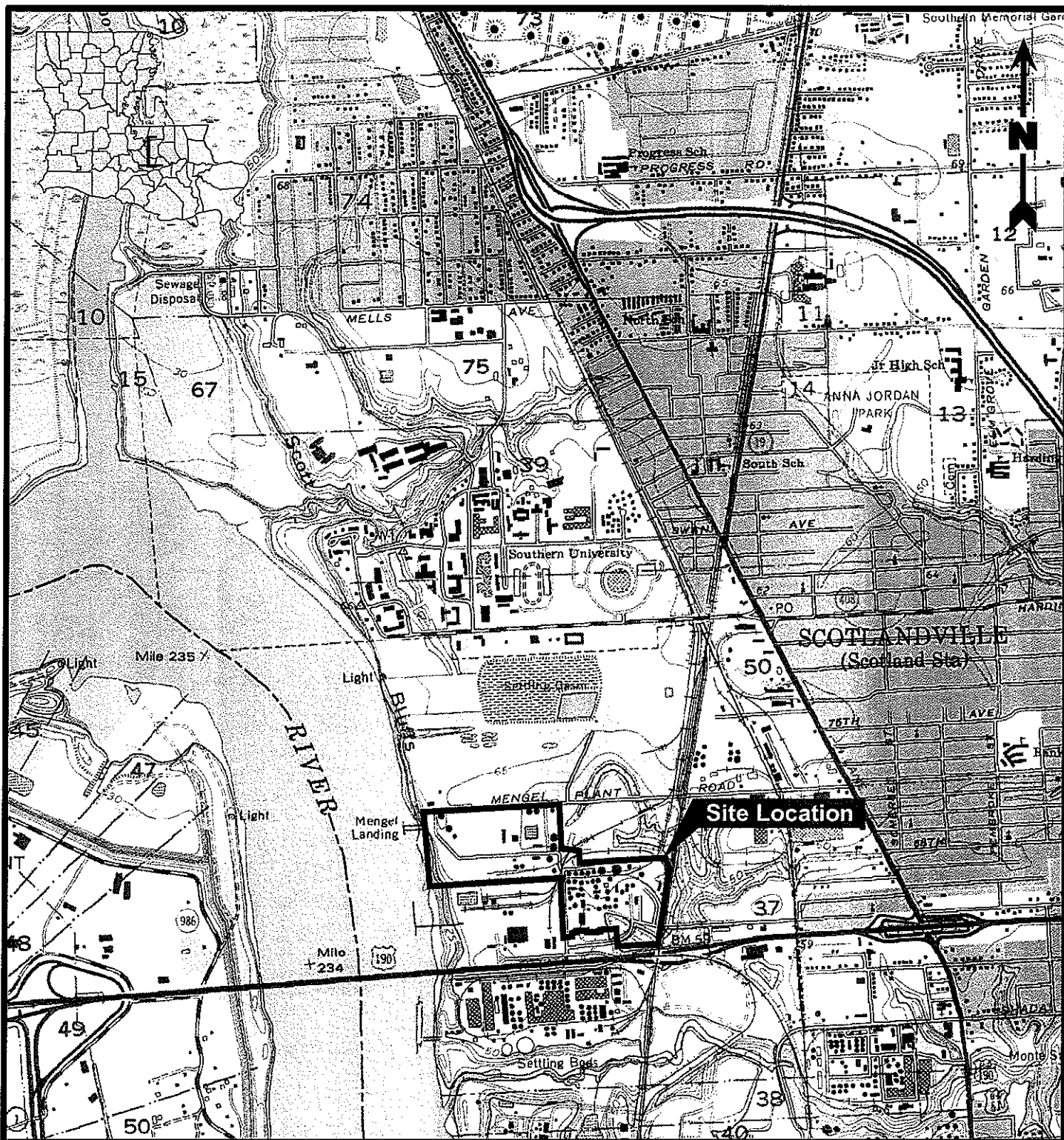
LAC 33:III.	Completeness Questions Relative to the Part 70 Permit	Yes	No	N/A	Location Within the
517.D.11 Test Methods	Has a Description of or a Reference to Applicable Test Methods Used to Determine Compliance with Standards been Provided?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	No change from current permit
517.D.12 Major Sources of TAPs	Does the Application include Information Regarding the Compliance History of Sources Owned or Operated by the Applicant (per LAC 33:III.5111)?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.D.13 Major Sources of TAPs	Does the Application include a Demonstration to show that the Source Meets all Applicable MACT and Ambient Air Standard Requirements?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Appendix C
517.D.14 PSD Sources Only	If Required by DEQ, Does the Application Include Information Regarding the Ambient Air Impact for Criteria Pollutants as Required for the Source Impact Analysis per LAC 33:III.509.K, L, and M?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.D.15 PSD Sources Only	If Required by DEQ, Does the Application Include a Detailed Ambient Air Analysis?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.D.16, 18	Has any Additional Information been Provided?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
517.D.17 Fees	Has the Fee Code been Identified?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 5
	Is the Applicable Fee Included with the Application?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	
517.E.1 Additional Part 70 Requirements	Does the Certification Statement Include a Description of the Compliance Status of Each Emission Point in the Source with All Applicable Requirements?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 10
517.E.2 Additional Part 70 Requirements	Does the Certification Statement Include a Statement that the Source will continue to Comply with All Applicable	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 10
517.E.3 Additional Part 70 Requirements	Does the Certification Statement Include a Statement that the Source will, on a timely basis, meet All Applicable Requirements that will Become Effective During the Permit Term?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	AAE - Section 10
517.E.4 Additional Part 70 Requirements	Are there Applicable Requirements for which the Source is not in Compliance at the Time of Submittal?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
	Does the Application include a Compliance Plan Schedule?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
	Does the Schedule Include Milestone Dates for which Significant Actions will occur?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
	Does the Schedule Include Submittal Dates for Certified Progress Reports?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.E.5 Additional Part 70 Requirements Acid Rain	Is this Source Covered by the Federal Acid Rain Program?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
	Are the Requirements of LAC 33:III.517.E 1-4 included in the Acid Rain Portion of the Compliance Plan?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	

PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

LAC 33:III	Completeness Questions Relative to the Part 70 Permit	Yes	No	N/A	Location Within the
517.E.6 Additional Part 70 Requirements	Have any Exemptions from any Applicable Requirements been Requested?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	No new exemption requests
	Is the List and explanations Provided?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.E.7 Additional Part 70 Requirements	Does the Application Include a Request for a Permit Shield?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	No new shield requested
	Does the Request List those Federally Applicable Requirements for which the Shield is Requested along with the Corresponding Draft Permit Terms and conditions which are Proposed to Maintain Compliance?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.E.8 Additional Part 70 Requirements	Does the Application Identify any Reasonably Anticipated Alternative Operating Scenarios?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
	Does the Application include Sufficient Information to Develop permit Terms and Conditions for Each Scenario, Including Source Process and Emissions Data?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
517.F Confidentiality	Does the Application Include a Request for Non-Disclosure (Confidentiality)?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
525.B. Minor Permit Modifications	Does the Application Include a Listing of New Requirements Resulting for the Change?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	No new requirements
	Does the Application Include Certification by the Responsible Official that the Proposed Action Fits the Definition of a Minor Modification as per LAC 33:III.525.A.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	cover letter
	Does the Certification also Request that Minor Modification Procedures be Used?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	cover letter
	Does the Application, for Part 70 Sources, Include the Owner's Suggested Draft Permit and Completed Forms for the Permitting Authority to Use to Notify Affected States?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
La. R.S. 30:2018 – PSD/NNSR only	Has a copy of the answers to the questions posed in the Environmental Assessment Statement (Section 25) been sent to the local governing authority at no cost to the local governing authority?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
	Has a copy of the answers to the questions posed in the Environmental Assessment Statement (Section 25) been sent to the designated public library at no cost to the designated public library?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	

Appendix A

Site Location Map



0 1,000 2,000 4,000
Feet

Reference

Base map comprised of U.S.G.S. 7.5 minute topographic map, "Scotlandville, LA" dated 1963 revised 1994. Image is referenced to UTM NAD 83 Zone 15.

Site Location Map

East Baton Rouge Parish

Rhodia Inc.
Baton Rouge, Louisiana



PROVIDENCE

ENGINEERING & ENVIRONMENTAL GROUP LLC

Doc. Code: 015-003

Drawn: LMH

Dwg. No.: 015-003-A020

Checked:

Approved:

Date: 02/02/05

1
Figure

Appendix B

Emission Calculations

TS-Proc Process GroupEmissions of TAP/HAPs (other than HCl, Cl₂, and metals) from processing TS streams

Assumed % of total VOCs that are TAP/HAP = 50% (except as noted for Unit 1 and Unit 2)

EQ ID	Source Description	total VOCs tpy	total HAPs tpy *
	Unit 1 + Unit 2	see note	0.052
21	TS Vapor Combustor	0.920	0.460
Fug-TS	TS Fugitives	2.944	1.472
M3	TS Sumps	0.073	0.036
Total TAPs for Process			2.021

* Excluding HCl, Cl₂, metals

Note: Unit 1 and Unit 2 are calc'd below (not as % of total VOCs b/c total VOCs are mostly from natural gas combustion):

45,000	TPY, max TS annual feed rate
100%	Max percent of total TS feeds that are TAP/HAP compounds
727,810	TPY, max spent acid annual feed rate
1%	Max percent of spent acid that is TAP/HAP compounds (liquid phase)
99.9999%	DRE
0.052	TPY total HAP/TAP

Spt-Proc Process Group

Emissions of TAP/HAPs (other than HCl, Cl₂, and metals) from processing spent streams

Assumed % of total VOCs that are TAP/HAP = 10%

EQ ID	Source Description	total VOCs tpy	HAPs tpy *
26	Spent Acid Barge Loading Scrubber	0.931	0.093
27	Acid Plant Vapor Combustor	1.950	0.195
Fug-Acid	Acid Plant Fugitives	0.650	0.065
M4	West End Sump	0.138	0.014
M7	001 Wastewater Treatment Unit	1.909	0.191
Total			0.558

* Excluding HCl and Cl₂

Total Site-Wide TAPs/HAPs

Summary

Rhodia is area source for HAPs (<25 TPY total HAPs, <10 TPY each HAP)

Rhodia is major source for TAPs (>10 TPY for sulfuric acid)

Rhodia exceeds MERs (based upon proposed permitted annual emissions) for:

sulfuric acid	antimony (and compounds)
HCl	arsenic (and compounds)
Cl ₂	barium (and compounds)
MIBK	chromium VI (and compounds)
H ₂ S	copper (and compounds)
	manganese (and compounds)
	nickel (and compounds)
	selenium (and compounds)
	zinc (and compounds)

Total HAPs (compare to 25 tpy)

Source - Permitted HAPs	Proposed Permit Limits (tpy)
Unit 1&2 (Cap-SAU) - HAP metals	0.404
Unit 1&2 (Cap-SAU) - HCl, Cl ₂	5.29
Sulfur Feed Tank- COS+CS ₂	0.29
TS Vapor Combustor - HCl and Cl ₂	0.38
AP Vapor Combustor - HCl and Cl ₂	0.41
Gasoline Tank	0.06
TS Process - total TAPs	2.02
Spent Acid Process - total TAPs	0.56
CathyVal MIBK per V3 permit	9.46
CathyVal Other HAPs per V3 permit	4.42
CVAL GCXVII per V3 permit	0.34
Total Acid Plant	9.41
Total CVAL Plant	14.22
TOTAL Overall	23.63

Total Site-Wide TAPs/HAPs

Individual TAP/HAPs

(compare to 10 tpy for HAPs)

(compare to MERs for TAPs)

Source	Proposed Permit Limits (tpy) TAPs that are not HAPs				
	H ₂ SO ₄	H ₂ S	barium (and compounds)	copper (and compounds)	zinc (and compounds)
Unit 1&2 (Cap-SAU)	41.90	--	0.181	0.111	0.220
Oleum Loading Vent Scrubber	0.002	--	--	--	--
Oleum Barge Loading Scrubber	0.001	--	--	--	--
Sulfur Feed Tank	--	2.16	--	--	--
TS Vapor Combustor	--	--	--	--	--
AP Vapor Combustor	--	--	--	--	--
Gasoline Tank	--	--	--	--	--
Fug-Acid	0.46	--	--	--	--
Spent Acid Process	--	0.01	--	--	--
TS Process	--	0.04	--	--	--
Acid Plant GCXVII	0.11	--	--	--	--
CathyVal per V3 permit	--	--	--	--	--
CVAL GCXVII per V3 permit	--	--	--	--	--
TOTAL, tpy	42.47	2.21	0.18	0.11	0.22
TOTAL, lbs/yr	84,942	4,420	362	222	440
MER, lbs/yr	75	1000	37.5	25	200

TAPs/HAPs not listed in this table are permitted only in TS Process and Spent Acid Process.
These limits were intentionally calculated to be <= 95% of the MER.

Total Site-Wide TAPs/HAPs

Individual TAP/HAPs

(compare to 10 tpy for HAPs)
(compare to MERs for TAPs)

Source	Proposed Permit Limits (tpy) TAPs/HAPs														
	HCl	Cl ₂	CS ₂	COS	antimony (and compounds)	arsenic (and compounds)	beryllium (and compounds)	cadmium (and compounds)	chromium VI (and compounds)	cobalt (and compounds)	lead compounds	manganese (and compounds)	mercury (and compounds)	nickel (and compounds)	selenium (and compounds)
Unit 1&2 (Cap-SAU)	3.59	1.70	--	--	0.032	0.022	0.012	0.012	0.030	0.03	0.08	0.080	0.012	0.038	0.056
Oleum Loading Vent Scrubber	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Oleum Barge Loading Scrubber	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Sulfur Feed Tank	--	--	0.29	0.001	--	--	--	--	--	--	--	--	--	--	--
TS Vapor Combustor	0.36	0.02	--	--	--	--	--	--	--	--	--	--	--	--	--
AP Vapor Combustor	0.39	0.02	--	--	--	--	--	--	--	--	--	--	--	--	--
Gasoline Tank	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Fug-Acid	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Spent Acid Process	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TS Process	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Acid Plant GCXVII	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
CathyVal per V3 permit	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
CVAL GCXVII per V3 permit	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TOTAL, tpy	4.34	1.74	0.29	0.001	0.03	0.02	0.01	0.01	0.03	0.03	0.08	0.08	0.01	0.04	0.06
TOTAL, lbs/yr	8,680	3,480	580	2	64	44	24	24	60	60	160	160	24	76	112
MER, lbs/yr	500	100	2400	1000	37.5	25	25	25	25	sup	sup	75	25	25	25

TAPs/HAPs not listed in this table are permitted only in TS Process and Spent Acid Process.
These limits were intentionally calculated to be <= 95% of the MER.

Total Site-Wide TAPs/HAPs

Source	Proposed Permit Limits (tpy) TAPs/HAPs												
	MIBK	methanol	chloroethane	methyl chloride	phenol	hydroquinone	pyro-catechol	n-hexane	benzene	toluene	2,2,4-trimethyl pentane	ethyl-benzene	xylene
Unit 1&2 (Cap-SAU)	--	--	--	--	--	--	--	--	--	--	--	--	--
Oleum Loading Vent Scrubber	--	--	--	--	--	--	--	--	--	--	--	--	--
Oleum Barge Loading Scrubber	--	--	--	--	--	--	--	--	--	--	--	--	--
Sulfur Feed Tank	--	--	--	--	--	--	--	--	--	--	--	--	--
TS Vapor Combustor	--	--	--	--	--	--	--	--	--	--	--	--	--
AP Vapor Combustor	--	--	--	--	--	--	--	--	--	--	--	--	--
Gasoline Tank	--	--	--	--	--	--	--	0.01	0.01	0.01	0.01	0.01	0.01
Fug-Acid	--	--	--	--	--	--	--	--	--	--	--	--	--
Spent Acid Process	0.01	0.50	0.50	0.39	0.02	0.50	0.50	0.50	0.01	0.50	0.50	0.50	0.50
TS Process	0.01	0.50	0.50	0.50	0.16	0.50	0.50	0.50	0.10	0.50	0.50	0.50	0.50
Acid Plant GCXVII	--	--	--	--	--	--	--	--	--	--	--	--	--
CathyVal per V3 permit	9.46	3.38	0.12	0.23	0.39	0.09	0.21	--	--	--	--	--	--
CVAL GCXVII per V3 permit	0.04	0.04	0.04	0.04	0.06	0.05	0.07	--	--	--	--	--	--
TOTAL, tpy	9.48	4.38	1.12	1.12	0.57	1.09	1.21	1.01	0.12	1.01	1.01	1.01	1.01
TOTAL, lbs/yr	18,960	8,760	2,240	2,240	1,140	2,180	2,420	2,020	240	2,020	2,020	2,020	2,020
MER, lbs/yr	15,000	20,000	20,000	7750	1400	NA - sup	NA - sup	13,000	260	20,000	NA - sup	20,000	20,000

TAPs/HAPs not listed in this table are permitted only in TS Process and Spent Acid Process.
These limits were intentionally calculated to be <= 95% of the MER.

Preheater; Acid Unit No. 1
EIQ 10

Op. Schedule¹ = 8760 hrs per year
 Max Firing Rate² = 5.6 MSCFhr
 Stack Flow = 13,300 DSCFM (Weston, 2012)
 Stack Flow = 26,500 WACFM (Weston, 2012)
 Stack Temp = 550 degF (Weston, 2012)
 Stack Height = 62 feet above grade (new stack ~March 2013)
 Stack Diameter = 42 inches (new stack ~March 2013)
 Stack Velocity = 46 ft/sec (new stack)
 Stack CSA = 9.621 ft²

Pollutant	Emission Factor (lb/MMscf) ³	Average Emissions (lbs/hr)	Maximum Emissions (lbs/hr)	Annual Emissions (tpy)
PM-10	7.6	0.04	0.04	0.19
Sulfur Dioxide	0.6	0.003	0.003	0.01
Nitrogen Oxides	100	0.56	0.56	2.45
Carbon Monoxide	84	0.47	0.47	2.06
VOCs	5.5	0.03	0.03	0.13

Notes:

¹ Conservative estimate of operating schedule per Fred Buchmann

² Maximum firing rate per Sam Magee, verified 12/17/01.

³ AP-42 Section 1.4, Natural Gas Combustion, 7/98. Note: Factors for Small Boilers (<100 MMBtu/hr) were used. NOx emissions were assumed to be uncontrolled.

Sulfur Feed Tank

EIQ 20

Basis and Assumptions

1. Molten sulfur is brought onsite and unloaded into the 150-gal sulfur unloading tank. After the desired tank level is reached, the molten sulfur is simultaneously pumped out of the unloading tank into the sulfur feed tank keeping a constant level in the unloading tank.
2. The vapor space of the sulfur unloading tank vents into the sulfur feed tank; the sulfur feed tank vents to the atmosphere.
3. Working-loss emissions from the sulfur feed tank are estimated using the concentration of H₂S, SO₂, CS₂, and COS in the vapor space and multiplying by the net vapor displacement from the sulfur feed tank while unloading. Net vapor displacement while unloading is assumed to be (gpm unloading rate - gpm feed rate to Units 1&2 + an additional 150 gals from each truck unloaded to account for the additional vapors from the initial filling of the sulfur unloading tank). Emissions are assumed to be zero when not unloading because of minimal vapor flow and Weston testing indicates that concentrations are non-detect shortly after unloading stops.

Concentration Data

	H ₂ S ppmv	SO ₂ ppmv	CS ₂ ppmv	COS ² ppmw	COS ppmv
Baton Rouge, 1999 testing above old sulfur pit	2	50	NA	NA	NA
Houston, sulfur tank, while unloading	2907	2.2	45.5	NA	NA
Baton Rouge, 2012, while unloading, avg ¹	32872	297	1954	21.4	10.3
Baton Rouge, 2012, while unloading, max ¹	38514	995	3478	23.9	11.5

¹Probe in gooseneck of main tank. Testing by Weston, verified via bag samples to Sherry Labs. Except for COS, used Weston results (higher) instead of Sherry results. Used Sherry results for COS since Weston did not test for it. Weston results are ppmvd; this calc treats as if not moisture corrected (conservative).

²COS is carbonyl sulfide, Sherry reported as ppmw.

Input Data

Molten Sulfur Temperature

284 °F
744 °R

Molten Sulfur Density

1.79 SG
111.70 lb/ft³ or 14.93 lbs/gal

Sulfur Feed Tank
EQ 20

Sulfur Usage / Feed Rate
(max at debottlenecked rates)

670 tpd
32,753,796 gals/yr
62.32 gpm

Truck Unloading Data

22 long tons per truck
2240 lbs per long ton
3300 gals/truck
9925 trucks/year
30 minutes to unload one truck
110 gpm unload rate
4962 hours per year unloading time

Universal Gas Constant (R) =

0.7302 ft³*atm / lb-mol*R

Calc Net Vapor Displacement (for annual emissions)

Add Sulfur unloaded	3300 gals/truck
Add Add'l displacement from unloading tank	150 gals/truck
Subtract feed to units	1870 gals/truck
Net vapor displacement	1581 gals/truck
	211 ft ³ /truck
	2,097,301 ft ³ /yr

Calc Gross Vapor Displacement (for max hourly emissions)

Add Sulfur unloaded	3300 gals/truck
Add Add'l displacement from unloading tank	150 gals/truck
Gross/max vapor displacement	3450 gals/truck
Max trucks per hour	2.0 trucks/hr
	923 ft ³ /hr max

Calc Stack Characteristics (for EQ form):

Stack Diameter	1.2 feet
Stack Gas Flow	15.4 ft ³ /min
Stack Gas Velocity	13.6 ft/sec

Sulfur Feed Tank
EIQ 20

Proposed Permit Emission Rates

	MW	avg ppmv	max ppmv	tpy	max lbs/hr	avg lbs/hr
H ₂ S (TAP, >MER)	34.1	32872	38514	2.16	2.23	0.49
SO ₂	64.1	297	995	0.04	0.11	0.01
CS ₂ (TAP&HAP, <MER)	76.1	1954	3478	0.29	0.45	0.07
COS (TAP&HAP, <MER)	60.1	10.3	11.5	0.001	0.0012	0.00
total VOC (Σ CS ₂ , COS)				0.29	0.45	0.07

Acid Plant Vapor Combustor EIQ 27

Stack Data

Stack Flow =	5,300 DSCFM (Weston, 2009)
Stack Flow =	21,500 WACFM (Weston, 2009)
Stack Temp =	1,520 degF (Weston, 2009)
Stack Height =	35 feet above grade
Stack Diameter =	55 inches (back calc'd from Weston 2009 stack CSA)
Stack Velocity =	21.7 ft/sec
Stack CSA =	16.5 ft ²

Description

The caustic scrubber (EIQ 13) and Acid Plant Vapor Combustor (APVC) operating in series are the backup control device for the spent acid storage tanks in the tankfarm (primary control device is Unit 1 furnace); other minor sources include the IFS Mix Tank, IFS railcar cleaning, and venting of railcars after they are pressure unloaded. The caustic scrubber provides SO₂ control and the APVC provides VOC control. As a backup to the Unit 1 furnace, the scrubber/APVC operate about 25% of the year. However, the pilot flame on the combustor is always lit. Thus, the operating schedule is shown as 52 weeks per year, but the majority of the emissions occur during 25% of the year.

Hours in Standby/Pilot:	6570	hours
Hours Controlling Emissions:	2190	hours

Natural Gas, Pilot

SCFM	1.0
MMSCF/hr	0.0001

Natural Gas, Assist Gas

SCFM	132
BTU/SCF	1040
MMBTU/hr	8.24
MMSCF/hr	0.008

Vent Gas, Max:

lbs/hr	152.88	max from Dec 2001 test
BTU/lb	21221	assume butane
MMBTU/hr	3.24	
TOTAL MMBTU/hr when venting	11.48	
Overall avg MMBTU/hr	5.35	(weighted avg of pilot and venting time, for EIQ form)

Acid Plant Vapor Combustor
EIQ 27

Emission Summary:

	AP-42 Factor lbs/MMSCF ¹	John Zink Factor lbs/MMBTU ³	Avg When Venting (25%)		Avg in Pilot (75%)		Overall Avg lbs/hr	Maximum		Annual TPY
			lbs/hr	Ref	lbs/hr	Ref		lbs/hr	Ref	
PM ₁₀	7.6		0.06	4a	0.00046	4b	0.02	0.06	4a	0.07
CO	84		6.74	6	0.00504	4b	1.69	15.13	8	7.40
NOx	100	0.60	1.16	6	0.00600	4b	0.29	6.89	7	1.29
SO ₂	0.6		0.04	8	0.00004	4b	0.01	0.40	9	0.04
HCl			0.35	12			0.09	2.24	12	0.39
chlorine			0.02	12			0.005	0.11	12	0.02
Total VOC	5.5		1.78	8	0.00033	4b	0.45	7.64	10	1.95

References

1. AP-42 Section 1.4, Natural Gas Combustion, 7/98, Factors for Small Boilers (<100 MMBtu/hr).
3. Factor provided by John Zink "typical high" for vapor combustors.
- 4a. AP-42 Factor and max natural gas firing rate.
- 4b. AP-42 Factor and pilot natural gas firing rate.
6. Average of June 2010 test results, 2 of the 4 runs were during barge unloading (max rates).
7. John Zink Factor and max MMBTU/hr (natural gas + vent).
8. Maximum stack test result to date (from Sept 2009, while unloading a barge).
9. Estimate as 10X the average rate when venting.
10. Apply 95% control to max uncontrolled VOC rate

12. Estimate as follows:	VOCs vented, max lbs/hr (max of all data on combustor inlet)	152.88
	VOCs vented, avg lbs/hr (avg of all data on combustor inlet)	72.59
	% of VOCs vented that are chlorinated organics, max	1.50%
	% of VOCs vented that are chlorinated organics, average	0.50%
	DRE of chlorinated organics	100%
	% converted to HCl	95%
	% converted to Cl ₂	5%

Appendix C

LA MACT Standards

MACT is required for Class I and II TAPs that are permitted site-wide above their respective minimum emission rates (MERs). The application does not propose to change any emission rates of class I or II TAPs, thus no new MACT determinations are needed. Additionally, there is no change to the existing MACT determinations with this permit application.

LA Ambient Air Standards

This permit application proposes to increase the site-wide emission rate for the Class III TAP hydrogen sulfide to a level above its MER (from 980 lbs/yr to 4420 lbs/yr; the MER is 1000 lbs/yr). Rhodia conducted modeling to assess the impact of increased emission on the predicted ambient air concentrations. The modeling did not predict any exceedances (maximum 265 $\mu\text{g}/\text{m}^3$ versus the standard of 330 $\mu\text{g}/\text{m}^3$). A modeling report will be submitted to LDEQ upon request.